

December 21, 2017

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
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Dear Ms. Walli:

Re: EB-2017-0255/EB-2017-0224/EB-2017-0275 – Union Gas Limited (Union), Enbridge Gas Distribution Inc. (EGD) and EPCOR Natural Gas Limited Partnership (EPCOR) 2018 Cap and Trade Compliance Plans.

Industrial Gas Users Association (IGUA) Request for Intervention.

We write as legal counsel to IGUA to request that IGUA be granted intervenor status in the captioned combined proceeding.

Description of IGUA

IGUA is an association of industrial companies located in the Canadian provinces of Ontario and Québec, who use natural gas in their industrial operations. IGUA was first organized in 1973 and it provides a coordinated and effective public policy and regulatory voice for those industrial firms depending on natural gas as a fuel or feedstock. IGUA has become the recognized voice representing the industrial user of natural gas before regulatory boards and governments at both the provincial and national levels.

The Association's activities are guided by a 15 member Board of Directors, constituted to assure that each industrial sector and geographic region is represented. The Board of Directors has regularly scheduled meetings at least six times each year. A full time President and other staff are based in a permanent office in Ottawa.

Through regulatory intervention, government advocacy, marketing, promotion, partnerships, education and outreach, IGUA successfully represents industrial gas users. Our mission is to be the voice of our members within the natural gas industry through intervention, advocacy, and partnerships.

Nature and Scope of IGUA's Intended Participation

IGUA's continuing interest in compliance by Ontario's natural gas distributors with the Ontario cap and trade regime, and recovery of associated compliance costs from ratepayers, is ensuring that the position of IGUA's constituents, most of whom are large final emitters, is appropriately considered in allocation of compliance costs for recovery. IGUA has also advocated for transparency in respect of cap and trade compliance costs, and has a continuing interest in how Ontario's natural gas distributors communicate with customers regarding their compliance activities and associated costs and customer rate impacts.

IGUA anticipates that its focus in this application will be primarily on the compliance plans, and RNG program proposals, of EGD and Union.

Intention to Seek an Award of Costs

IGUA also hereby requests that it be determined eligible for recovery of its reasonably incurred costs of its intervention herein.

As a party primarily representing the direct interests of industrial consumers (i.e. ratepayers) in relation to regulated services, IGUA has in the past been determined to be eligible for cost awards pursuant to section 3.03(a) of the Board's *Practice Direction on Cost Awards*.

Request for Written Evidence and Contact Information

IGUA requests that copies of written evidence and all circulated correspondence related to this matter be directed to it as follows:

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We have an electronic copy of the prefiled materials and do not require a hard copy.

Yours truly,



Ian A. Mondrow

- c:
- A. Stiers (Union)
 - C. Smith (Torys)
 - A. Mandyam (EGD)
 - F. Oliver-Glasford (EGD)
 - D. Stevens (Aird & Berlis LLP)
 - D. O'Leary (Aird & Berlis LLP)
 - S. Rahbar (IGUA)
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