

March 2, 2018

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-2017-0319 – Enbridge Gas Distribution Inc. (EGD) Application for Renewal Natural Gas (RNG) Enabling Program and Geothermal Energy Service Program.

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 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 members have a continuing interest in the development by regulated utilities of new forms of energy supply and new regulated energy services, and in the allocation to ratepayers of the costs (in line with the benefits) of those supplies and services. IGUA's members are large final emitters under Ontario's Carbon Cap & Trade regime and also have an interest in the activities of Ontario's regulated utilities in effecting and facilitating carbon reduction in provincial gas use, and in the allocation of the costs (in line with the benefits) of such activities. Finally, IGUA has an interest in (and in general supports) the development of RNG in the province, and has a continuing interest in both how such development is undertaken and in how access is provided to the resulting "green" gas stream.

Written or Oral Hearing

Pending completion of our review of the pre-filed material, we do not at this time have a view regarding whether a written hearing would be appropriate in this application, or whether an oral hearing would be advisable.

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, including ratepayer funded DSM programs, 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 pre-filed materials and do not require a hard copy.

Yours truly,


Ian A. Mondrow

c: A. Mandyam (EGD)
D. Stevens (Aird & Berlis LLP)
S. Rahbar (IGUA)
S. Zhang (Board Staff)

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