

December 12, 2018

**VIA RESS AND COURIER**

Ms. Kirsten Walli  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
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Dear Ms. Walli:

**Re: EB-2018-0306 – Union Gas Limited (Union) Stratford Reinforcement Project.**

**Industrial Gas Users Association (IGUA) Request for Intervention.**

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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 interest in this application lies primarily in assessing the rate impact of the proposed reinforcement on existing Union gas customers. We intend to confirm particulars of such impact through limited interrogatories.

IGUA has also recently raised<sup>1</sup> questions regarding allocation of costs for multi-purpose reinforcement/expansion facilities. Union addresses this issue in its pre-filed material herein, clarifying the transmission function of the proposed reinforcement. Subject to confirmation as the record herein develops, IGUA expects to support Union's position herein in this respect.

Focussing on these two issues, IGUA expects its participation in this matter to be relatively constrained, though nonetheless important to its members and hopefully contributory to the Board's deliberations.

### **Written or Oral Hearing**

We anticipate that this matter can be appropriately adjudicated by way of a written hearing.

### **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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<sup>1</sup> Union's Kingsville reinforcement project; EB-2018-0013.

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

Yours truly,



Ian A. Mondrow

c: M. Murray (Union)  
S. Rahbar (IGUA)  
A. Manzano (OEB Staff)

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