

January 9, 2019

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
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T1017406 (EGD)
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Dear Ms. Walli:

Re: EB-2018-0301 – Enbridge Gas Distribution Inc. (EGD) Disposition of 2016 Demand Side Management Deferral and Variance Accounts.

EB-2018-0300 – Union Gas Limited (Union) 2016 Disposition of Demand Side Management Deferral and Variance Accounts.

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 proceedings. These Applications have been combined by the OEB, and this intervention request pertains to both Applications.

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 historically attracted much DSM programming and DSM regulatory review attention from Ontario's two main gas utilities and from DSM advocates in the province. On behalf of its member companies IGUA was active in DSM plan proceedings and settlements prior to the Board's 2014 DSM Framework review [EB-2014-0134] and participated in the DSM Working Group struck in the course of that 2014 review. IGUA then participated as an active intervenor in the Ontario gas utilities' 2015-20 DSM Plan applications [EB-2015-0029/EB-2015-0049], and in the applications by each of the utilities for disposition of their respective 2015 DSM Variance Accounts [EB-2017-0323/ EB-2017-0324].

Subject to completion of our review of the pre-filed materials and, as appropriate, discoveries, IGUA anticipates that its primary interest in this proceeding will be in review of the balances sought to be cleared to large industrial ratepayers, and validation of the large volume customer DSM evaluations and resulting allocations supporting those balances.

Written or Oral Hearing

As was the case in respect of the utilities' 2015 DSM VA applications, we expect that the instant Applications can be appropriately adjudicated through a written process, but this view is subject to our completion of review of the materials pre-filed herein.

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 interventions in these Applications.

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 these matters be directed to it as follows:

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We have electronic copies of the prefiled materials and do not require hard copies.

Yours truly,



Ian A. Mondrow

c: A. Stiers (Union)
M. Seers (Torys)
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D. O'Leary (Aird & Berlis LLP)
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