

January 23, 2019

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
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Dear Ms. Walli:

Re: EB-2018-0305 – Enbridge Gas Inc. (EG) 2019 Rates Application.

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 was an active intervenor in the proceeding which approved the Enbridge Gas Distribution Inc. and Union Gas Limited merger to create Enbridge Gas Inc. (EG) and directed a 5 year rebasing deferral and associated rate plan [EB-2017-0306/EB-2017-0307]. On behalf of its members, EG's largest volume customers, IGUA has a direct interest in the setting of rates under the new EG rate plan for 2019 (and beyond).

Written or Oral Hearing

This is an application to set the first year of rates under a new 5 year rate plan for a new, and by far the largest, gas distributor in the province. The application also requests inclusion of significant capital pass through, through an Incremental Capital Module (ICM), for a number of major recent rate base investments by the predecessor regulated entities. Considering this, we respectfully suggest that the Board should, at this early stage in the matter, contemplate the potential for an oral hearing of some or all of the issues raised 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: K. Culbert (EGD)
V. Innis (Union)
M. Kitchen (Union)
C. Smith (Lax O'Sullivan)
S. Rahbar (IGUA)
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