

March 5, 2019

VIA RESS AND COURIER

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

Re: EB-2018-0205 – Enbridge Gas Inc. (EG) 2019 Federal Carbon Pricing Program 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 has actively participated in previous carbon regulation related (cap and trade) cost recovery applications, focussing on the nature and quantum of the costs to be recovered from, *inter alia*, its members (being Trade Exposed Large Final Emitters, which under the Federal carbon pricing scheme will be subject to the Output-Based Pricing System (OBPS) requirements). These would be facilities related costs and, potentially, some administrative costs. IGUA's focus in the instant matter will be the same.

Written or Oral Hearing

Pending more detailed review of EG's recent application, we do not have a view at present regarding whether an oral hearing is required in this matter. However, given this is the first application under the Federal carbon pricing scheme and thus entails terminology and concepts "of first instance" to the Board, some post interrogatory additional information gathering and testing may be appropriate in order to ensure a complete factual basis and understanding upon which to set the regulatory framework for implementation by the Ontario gas distributors of this new legislative scheme. The Board may thus wish to reserve opportunity for an oral hearing pending completion of written discovery.

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 (EGI)
 M. Seers (Torys)
 S. Rahbar (IGUA)
 M. Bell (OEB Staff)

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