

April 16, 2019

VIA RESS AND COURIER

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

**Re: EB-2018-0263 – EPCOR Natural Gas Limited Partnership (EPCOR) Southern Bruce
Leave to Construct 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

In addition to IGUA's members' continuing interest in the appropriate allocation of costs associated with natural gas system expansions and reinforcements in general, and the appropriate framework for facilitating economic gas system expansions to heretofore unserved communities in particular, one or more IGUA members would be directly served by the proposed project. We also note that this is among the first community expansion projects under the Ontario Government's *Expansion of Natural Gas Distribution Systems* regulation (O. Reg. 24/19), the application of which to the OEB's pre-existing framework for natural gas system expansions is of interest to IGUA (as evidenced by IGUA's active participation in the OEB's previous work in this area).

Written or Oral Hearing

Considering that the proposed expansion would be EPCOR's first significant new service project in the province, as the matter currently stands we suggest that provision for an oral hearing would be appropriate.

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: B. Brandell (EPCOR)
 D. Bissoondatt (EPCOR)
 R. King (Osler, Hoskin & Harcourt LLP)
 S. Rahbar (IGUA)
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