

May 6, 2019

**VIA RESS AND COURIER**

Ms. Kirsten Walli  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

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T1016678

Dear Ms. Walli:

**Re: EB-2018-0264 – EPCOR Natural Gas Limited Partnership (EPCOR) Southern Bruce Rate 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 will be served by EPCOR and thus will be subject to the rates approved in this proceeding, potentially for several years. As such, IGUA and its members, including its members who will be EPCOR customers, have a direct interest in the details of EPCOR's rate proposals.

### **Written or Oral Hearing**

EPCOR, as a new gas distribution entrant in the South Bruce service territory, is proposing a brand new set of rates, developed from costs related to brand new gas distribution infrastructure and associated upstream service arrangements. In this circumstance, it is much too early to be able to determine that an oral hearing will not be required. We respectfully suggest that the Board anticipate, and schedule time for, an oral hearing in this matter.

### **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 electronic copies of written evidence and all circulated correspondence related to these matters be directed to it as follows:

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We do not require hard copies.

Yours truly,



*for:* Ian A. Mondrow

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