

May 23, 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  
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Dear Ms. Walli:

**Re: EB-2019-0003 – Post-2020 Natural Gas Demand Side Management Framework.  
Industrial Gas Users Association (IGUA) Interest in Participating.**

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We write as legal counsel to IGUA, and in response to the Board's May 21<sup>st</sup> notice to interested parties regarding the captioned consultation, to express IGUA's interest in participating.

### **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 a significant amount of DSM programming attention from Ontario's gas distributors and from DSM advocates in the province, and a concomitant allocation of ratepayer funding obligation. Following one particular instance of the allocation of significant DSM spending in excess of budget to the Union Gas rate classes into which a number of IGUA's members fall, IGUA became centrally engaged in the OEB's DSM processes, advocating for controlled programming and spending on DSM for industrial gas consumers. On behalf of its member companies IGUA was active in 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 and EB-2015-0049], and in subsequent DSM variance account disposition applications.

As the Board and Ontario's gas utilities and DSM advocates embark on the next generation of ratepayer funded DSM programming, IGUA seeks to participate actively in the instant consultation. IGUA will take this opportunity to refresh its own policy and position on the appropriate role of, and parameters for, ratepayer funded DSM for Ontario's largest gas consumers, particularly in an era of overt carbon regulation and heightened industrial intra and extra-jurisdictional competition for markets and capital. IGUA looks forward to sharing its members' perspectives on the relevant issues with the Board and interested parties as this consultation proceeds.

### **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 participation herein, within the Board's cost award guidelines for the consultation process.

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 Copies of Materials and Contact Information**

IGUA requests that copies of written materials and circulated correspondence related to this matter be electronically directed to it as follows:

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Yours truly,

  
Ian A. Mondrow

c: Dr. Shahrzad Rahbar (IGUA)  
Josh Wasylyk (Board Staff)

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