

August 9, 2019

VIA RESS AND COURIER

Ms. Kirsten Walli
Board Secretary
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
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Dear Ms. Walli:

Re: EB-2019-0137 – Consultation to Review Natural Gas Supply Plans.

Industrial Gas Users Association (IGUA) Intention to Participate.

We write as legal counsel to IGUA further to the Board's July 25th letter to interested parties initiating the captioned consultation. IGUA intends to participate in this consultation, and also requests cost eligibility for its participation therein.

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.

IGUA's Interest in the Consultation & Intended Participation

As representative of the largest gas users in Ontario, IGUA has consistently engaged in gas planning and gas supply matters before the Board, including as a member of the Board convened working group which contributed to Board Staff's work in support of development of the EB-2017-0129 *Framework for the Assessment of Distributor Gas Supply Plans*.

IGUA's participation on gas supply planning matters is informed by the fact that IGUA's members obtain their gas supply primarily under direct purchase (rather than system supply) arrangements. IGUA's members are directly impacted by gas supply planning related to load balancing, storage and overrun services and by the impacts of gas supply planning on gas delivery obligations. IGUA's members are also impacted by the influence which Enbridge Gas Inc.'s gas supply planning and implementation activities have on the liquidity and robustness of the Ontario gas market.

On behalf of IGUA we plan to attend the September 23rd, 2019 Stakeholder Conference in person, and anticipate submitting written comments thereafter as currently scheduled.

Intention to Seek an Award of Costs

IGUA requests that it be determined eligible for recovery of its reasonably incurred costs of its participation in this consultation.

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*.

Contact Information

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

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Electronic copies are sufficient and we do not require hard copies.

Yours truly,


Ian A. Mondrow

c: S. Rahbar (IGUA)
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