

October 17, 2019

VIA RESS AND COURIER

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

Ian A. Mondrow
Direct 416-369-4670
ian.mondrow@gowlingwlg.com

Assistant: Cathy Galler
Direct: 416-369-4570
cathy.galler@gowlingwlg.com

T1020396

Dear Ms. Walli:

Re: EB-2019-0183 – Enbridge Gas Inc. (EG) Owen Sound Reinforcement Project Leave to Construct and Rate M17 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 represents two large industrial gas customers in the new EPCOR South Bruce gas distribution franchise whose gas costs will be directly affected by the proposed reinforcement and M17 rate. IGUA thus has a direct interest, on behalf of its members, in the reinforcement (costs and timing) and in EG's proposal for recovery of costs for service provided (through the reinforcement and otherwise) from EPCOR South Bruce and, in turn, EPCOR South Bruce's gas distribution customers.

Written or Oral Hearing

Given the historical contentiousness of the matter of extension of (then) Union Gas service to EPCOR South Bruce, we suggest that it would be prudent for the Board to allow in its working schedule for an oral hearing process, pending completion of discoveries and any settlement or other process directed in the interim.

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:

Ian Mondrow, Partner
GOWLING WLG (CANADA) LLP
Suite 1600, 1 First Canadian Place
100 King Street West
Toronto, Ontario
M5X 1G5

Phone: 416-369-4670
Fax: 416-862-7661
E-Mail: ian.mondrow@gowlingwlg.com

Dr. Shahrzad Rahbar
President
INDUSTRIAL GAS USERS ASSOCIATION
260 Centrum Boulevard, Suite 202
Orleans, Ontario
K1E 3P4

Office: 613-236-8021
Mobile: 613-983-2927
E-Mail: srahbar@igua.ca

We have electronic copies of the pre-filed materials and do not require hard copies.

Yours truly,



Ian A. Mondrow

- c: B. Ott (EGI)
- G. Pannu (EGI)
- C. Keizer (Torys)
- S. Rahbar (IGUA)

TOR_LAW\ 10083799\1