

January 13, 2020

VIA RESS AND COURIER

Ms. Christine E. Long
Registrar and Board Secretary
ONTARIO ENERGY BOARD
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Dear Ms. Long:

Re: EB-2019-0271 – Enbridge Gas Inc. (EG) 2021 DSM Plan 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

EG's DSM programs, and those of Union Gas and Enbridge Gas Distribution before them, include programs for large volume gas consumers, including IGUA's members whose rates include the OEB approved costs of those programs. On behalf of its members IGUA has been active in the Board's various DSM policy and rate proceedings for several years, and has a continuing interest in these matters.

On December 9, 2019 we filed a letter on behalf of IGUA regarding EG's proposal to continue its current DSM plan for a year (from January through December, 2021) pending determination by the Board of a DSM framework to replace the current framework which runs through the end of 2020. IGUA did not oppose EG's request for extension of its current DSM Plan for a year, with the caveat that, for the reasons set out in our December 9th letter, the Board should expressly retain its discretion to provide supplementary direction to EG regarding transition of its DSM programs between the current DSM framework and the replacement framework to be developed. Other parties have since filed proposals for alternative response to EG's application, including requiring an application for an expanded DSM program for 2021.

IGUA intends to actively participate in any process for review of this application directed by the Board, and will consider the submissions made, and to be made, by others in formulation of its further position on the issues engaged.

Written or Oral Hearing

Given the transitional nature of this application, bridging as it does two DSM frameworks, this seems to us to be a matter most efficiently addressed through a written process. This view is subject to any further direction that the Board might issue regarding the matters that it will (and will not) consider in reviewing this application.

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 pre-filed materials and do not require hard copies.

Yours truly,


Ian A. Mondrow

c: A. Stiers (EGI)
D. O'Leary (Aird & Berlis LLP)
J. Wasylyk (OEB Staff)
S. Rahbar (IGUA)

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