

January 14, 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-2019-0247 – Enbridge Gas Inc. (EG) 2020 Federal Carbon Pricing Program 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's members are generally not subject to the customer volume driven carbon costs incurred by EG. IGUA also recognizes that the facilities carbon costs to be incurred by EG and the costs incurred by EG to administer the carbon pricing regime will have a relatively minor impact on IGUA's members' gas costs.

In EG's 2019 Federal Carbon Pricing Program Application (EB-2018-0205) the Board expressly stated that it would not be considering additional measures that EG should undertake to reduce GGPPA covered emissions (i.e. abatement initiatives), as there were other proceedings in which measures promoting energy efficiency and the reduction of greenhouse gasses could be considered.¹ EG has not addressed the topic of abatement initiatives in the instant application, and IGUA is not advocating that it should. If it remains the case that the Board will not consider the topic of abatement initiatives in reviewing the instant application, then IGUA will have limited interest in this matter and does not anticipate being very active in it. In the event that this topic is to be considered by the Board, however, IGUA would have an interest in any such consideration and accordingly, has sought intervenor status herein pending such a determination.

Written or Oral Hearing

If the Board again determines that it will not consider the topic of abatement initiatives, then this matter can likely be determined through a written hearing.

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 intervention in this Application.

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*.

The extent of IGUA's participation in this matter will, as noted above, depend on the Board's early determinations regarding the scope of its considerations.

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:

¹ EB-2018-0205, Procedural Order No. 2, page 2.

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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)
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