

January 14, 2020

VIA RESS AND COURIER

Ms. Christine E. Long
Registrar and Board Secretary
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
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T1020623

Dear Ms. Long:

Re: EB-2019-0159 – Enbridge Gas Inc. (EG) 2021 Dawn Parkway Expansion Project.

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 is interested in the project for which leave to construct is being sought. The Dawn-Parkway system has been an integral part of the overall gas transportation and distribution services network in Ontario and its continued prudent expansion is important to all Ontario gas transportation and distribution customers, including IGUA's members (who are transportation as well as distribution customers). IGUA is also interested in the Integrated Resource Planning (IRP) proposal brought forward by EG for approval for application to future balancing of demand and capacity on the Ontario system. IGUA anticipates being actively engaged on both of these aspects of the application.

Written or Oral Hearing

The IRP proposal, which is expressly brought forward to apply to future system optimization initiatives, is likely to raise important policy issues for consideration by the Board. The Board may thus wish to preserve the flexibility to schedule an oral hearing for some or all aspects of this application pending completion of written discoveries and any settlement discussions provided for.

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)
 G. Pannu (EGI)
 C. Keizer (Torys)
 M. Seers (Torys)
 S. Rahbar (IGUA)
 Z. Crnojacki (OEB Staff)

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