

April 30, 2020

VIA RESS

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

Re: EB-2020-0091 – Enbridge Gas Inc. (EG) Integrated Resource Planning (IRP) Proposal.
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

As representative of major users of the EG system IGUA has an interest in the IRP proposal for application to future balancing of demand and capacity on the Ontario gas delivery system. We noted this in our January 14, 2020 letter filed with the Board on behalf of IGUA requesting intervenor status in EG's 2021 Dawn Parkway Expansion Project application [EB-2019-0159], the application in connection with which the IRP proposal under review in the instant proceeding was initially filed.

IGUA has in the past expressed support for evaluation of measures that can be taken to reliably address gas demand in a manner other than through long-term investments in conventional gas delivery infrastructure, where such alternative measures are more cost effective and/or better balance future system and ratepayer risks, including risks of stranded assets. IGUA has also expressed support for recognizing the need to fairly incent and remunerate regulated utilities for development and implementation of any such alternative measures.

IGUA anticipates being actively engaged in the Board's review of EG's IRP proposal on the basis of the interests and views noted above.

Written or Oral Hearing

At this early stage in the process, considering the potential breadth of the issues to be considered, and pending determination of an issues list and of what evidence parties will seek to file in addition to the material filed to date by EG, the Board may wish to assume a schedule which includes an oral 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 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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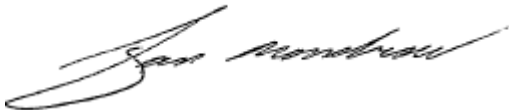
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We have electronic copies of the pre-filed materials and do not require hard copies.

Yours truly,



Ian A. Mondrow

c: S. Rahbar (IGUA)
Enbridge Gas Inc.
M. Parkes (Board Staff)
M. Millar (Board Staff)

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