

May 13, 2020

**VIA RESS**

Ms. Christine E. Long  
Registrar and Board Secretary  
**ONTARIO ENERGY BOARD**  
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Toronto, Ontario  
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Dear Ms. Long:

**Re: EB-2019-0294 – Enbridge Gas Inc. (EGI) Low Carbon Energy Project (LCEP).**

**Industrial Gas Users Association (IGUA) Request for Intervention.**

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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 does not have any members located in the proposed Low Carbon Energy Project area who would be served with hydrogen blended natural gas through the project. However, as representative of EGI's largest customers, IGUA does have an interest in innovation initiatives to decarbonize the natural gas stream, future proof natural gas delivery infrastructure in the province, and explore the potential to integrate electricity and natural gas systems to the benefit of all Ontario energy consumers. We anticipate that the instant application will engage some regulatory policy issues regarding the appropriate role of the regulated utility in innovation initiatives such as the proposed Low Carbon Project and the degree to which such initiatives are appropriately supported by ratepayers, and IGUA would like to be involved in the exploration and consideration of these regulatory policy issues.

### **Written or Oral Hearing**

Given the novel nature of the project proposed through this application and the attendant policy issues, we suggest that the Board provide for 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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We have electronic copies of the pre-filed materials and do not require hard copies.

Yours truly,



Ian A. Mondrow

c: S. Rahbar (IGUA)  
J. Denomy (EGI)  
D. Stevens (Aird & Berlis LLP)  
Z. Crnojacki (Board Staff)

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