

June 9, 2020

**VIA RESS**

Ms. Christine E. Long  
Registrar and Board Secretary  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
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Dear Ms. Long:

**Re: EB-2020-0094 – Enbridge Gas Inc. (EGI) Harmonized System Expansion Surcharge (SES), Temporary Connection Surcharge (TCS) and Hourly Allocation Factor (HAF) Application.**

**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 was an active participant in the Board's community gas expansion policy consultation proceeding (EB-2016-0004) and has been active in a number of specific community and gas system expansion proceedings since. IGUA's focus in these proceedings, as representative of large volume gas consumers, has been on feasibility and cost contribution mechanisms that respect the principles of "user pay" and "costs follow benefits", while recognizing the appropriateness of ratemaking approaches that facilitate gas system expansion and new customer connection where economically appropriate and in the best interests of the customers to be served, large and small.

In the instant application, EGI is proposing various harmonizations and modifications to its policies regarding feasibility and cost recovery determinations for community and system expansions. The proposed Hourly Allocation Factor (HAF) in particular would apply to allocation of expansion costs to large customers to be served by the expansions. As such, on behalf of its members IGUA has a direct interest in the proposals advanced herein.

We anticipate being active in all phases of this proceeding, in accord with the interests outlined above.

### **Written or Oral Hearing**

This application engages the determination of new policies regarding economic evaluation and cost allocation for gas system expansions, and raises considerations of how such policies are to be applied in various scenarios, the rationale therefore and the impacts thereof. It would be appropriate for the Board to provide for an oral hearing during which information provided in the pre-filed evidence and interrogatory responses can be properly tested with reference to various potential scenarios of applicability.

### **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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100 King Street West  
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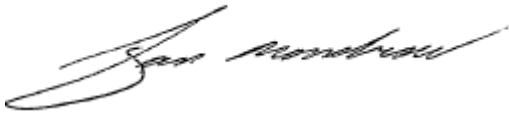
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We have electronic copies of the pre-filed materials and do not require hard copies.

Yours truly,



Ian A. Mondrow

c: S. Rahbar (IGUA)  
R. Torul (EGI)  
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