

August 5, 2020

VIA RESS

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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Dear Ms. Long:

Re: EB-2020-0095 – Enbridge Gas Inc. (EGI) 2021 Rates 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 was an active intervenor in the proceeding which approved the Enbridge Gas Distribution Inc. and Union Gas Limited merger to create EGI and directed a 5 year rebasing deferral and associated rate plan [EB-2017-0306/0307]. On behalf of its members, EGI's largest volume customers, IGUA has a direct interest in setting of rates for EGI.

Our initial review of the material filed to date indicates a relatively mechanical rate adjustment in this first phase of EGI's proposed two phase process. In respect of the issues addressed in the material filed to date we anticipate a relatively straightforward process. IGUA has also brought a motion in respect of reallocation of Panhandle System costs for 2021 rates [EB-2020-0156] which is currently before the Board, and if the Board grants the motion and directs such reallocation that would also be addressed in this proceeding and IGUA would be active on that topic.

Written or Oral Hearing

Our initial review of the material filed to date indicates a relatively non-contentious rate adjustment arising from the first phase of EGI's proposed two phase process, addressing inflation, the productivity stretch factor, and limited pass through costs. On these issues we anticipate a settlement discussion, and to the extent matters remain thereafter for adjudication we anticipate that a written argument process would suffice for these issues.

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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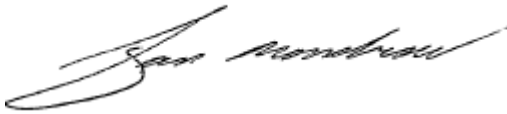
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We have electronic copies of the pre-filed materials and do not require hard copies.

Yours truly,



Ian A. Mondrow

c: S. Rahbar (IGUA)
M. Kitchen (EGI)
D. Stevens (Aird & Berlis LLP)
K. Viraney (OEB Staff)

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