

November 10, 2020

VIA RESS

Ms. Christine E. Long
Registrar
ONTARIO ENERGY BOARD
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2300 Yonge Street
Toronto, Ontario
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Dear Ms. Long:

Re: EB-2020-0181 – Enbridge Gas Inc. (EGI) 2021 Rates Application on ICM Funding Request.

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.

EGI's ICM proposal includes allocation of approximately \$1 million in revenue requirement to the T2 rate class under which IGUA members take service, as well as allocations to other rate classes in which IGUA members take service. As reflected in the Board's Notice of Application, it is appropriate for customers to review the application carefully to determine the affects on them of the proposal, and the Board expects to hear from customers and from groups that represent the customers of EGI. As representative of EGI's largest customers to whom EGI is proposing to allocate material ICM costs in 2021, IGUA intends that we carefully review the application to determine the affects on IGUA's members of EGI's proposal. Following that review we will be in position to make representations to the Board accordingly.

Written or Oral Hearing

The Board may wish to defer decision on whether to proceed with an oral hearing until following completion of the discovery process herein.

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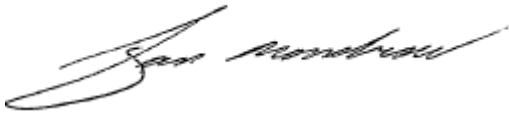
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We have electronic copies of the pre-filed materials and do not require hard copies.

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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