

March 2, 2021

**VIA RESS**

Ms. Christine E. Long  
Registrar  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

**Ian A. Mondrow**  
Direct 416-369-4670  
ian.mondrow@gowlingwlg.com

Assistant: Cathy Galler  
Direct: 416-369-4570  
cathy.galler@gowlingwlg.com

Dear Ms. Long:

**Re: EB-2021-0004: OEB Consultation to Review Annual Update to Five-Year Natural Gas Supply Plans.**

**Industrial Gas Users Association (IGUA) Intent to Participate.**

We write as legal counsel to IGUA further to the Board's February 19, 2021 letter to interested parties initiating the captioned consultation. IGUA intends to participate in this consultation, and also requests cost eligibility for its participation therein.

**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.

### **IGUA's Interest in the Consultation and Intended Participation**

As representative of the largest gas users in Ontario, IGUA has consistently engaged in gas planning and gas supply matters before the Board, including as a member of the Board convened working group which contributed to Board Staff's work in support of development of the EB-2017-0129 *Framework for the Assessment of Distributor Gas Supply Plans*.

IGUA's participation on gas supply planning matters is informed, and as appropriate will be moderated, by the fact that IGUA's members obtain their gas supply primarily under direct purchase (rather than system supply) arrangements. Nonetheless, IGUA's members are directly impacted by gas supply planning related to load balancing, storage and overrun services and by the impacts of gas supply planning on gas delivery obligations. IGUA's members are also impacted by the influence which Enbridge Gas Inc.'s gas supply planning and implementation activities have on the liquidity and robustness of the Ontario gas market, including with respect to alternative sources of gas supply and initiatives towards the use/blending of alternative fuels with Ontario's natural gas supply.

On behalf of IGUA we plan to participate in the discovery phases of this consultation, including attendance at the April 13-14, 2021 Stakeholder Conference, following which IGUA will determine whether it has comments to submit in respect of EGI's plan update.

### **Request for Costs**

IGUA also hereby requests that it be determined eligible for recovery of its reasonably incurred costs of participation in this matter. 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*.

We therefore respectfully request that the Board accept and consider IGUA's request for cost eligibility.

### **Contact Information**

IGUA requests that copies of correspondence and other materials related to this matter be directed to it as follows:

Ian Mondrow, Partner  
**GOWLING WLG (CANADA) LLP**  
Suite 1600, 1 First Canadian Place  
100 King Street West  
Toronto, Ontario  
M5X 1G5

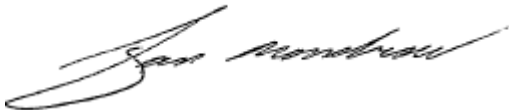
Phone: 416-369-4670  
Fax: 416-862-7661  
E-Mail: [ian.mondrow@gowlingwlg.com](mailto:ian.mondrow@gowlingwlg.com)

Dr. Shahrzad Rahbar  
President  
**INDUSTRIAL GAS USERS ASSOCIATION**  
260 Centrum Boulevard, Suite 202  
Orleans, Ontario  
K1E 3P4

Office: 613-236-8021  
Mobile: 613-983-2927  
E-Mail: [srahbar@igua.ca](mailto:srahbar@igua.ca)

Electronic copies are sufficient and we do not require hard copies.

Yours truly,



Ian A. Mondrow

c. S. Rahbar (IGUA)  
K. Viraney (OEB Staff)

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