

April 14, 2021

VIA RESS

Ms. Christine E. Long
Registrar
ONTARIO ENERGY BOARD
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Dear Ms. Long:

Re: EB-2021-0072 – Enbridge Gas Inc. (EGI) 2019 Demand Side Management (DSM) Deferral and Variance Account (DVA) Disposition 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

EGI's DSM programs, and those of Union Gas and Enbridge Gas Distribution before them, include programs for large volume gas consumers, including IGUA's members whose rates include the OEB approved costs of those programs. On behalf of its members IGUA has been active in the Board's various DSM policy and rate proceedings for several years and has a continuing interest in these matters.

We are continuing to review the pre-filed material in this matter. Based on our review to date, and subject to further development of the record, we anticipate that IGUA's involvement in this matter will be limited to understanding and validating the basis for the variance account balances allocated to the rate classes through which IGUA's members take gas distribution service.

Written or Oral Hearing

Given the audited results and relatively mechanical clearances, from IGUA's perspective we anticipate this matter can be addressed through a written process.

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)
A. Patel (EGI)
D. O'Leary (Aird & Berlis LLP)

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