

February 18, 2022

VIA RESS

Ms. Nancy Marconi
Acting Registrar
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th 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. Marconi:

Re: EB-2022-0094: Ontario Energy Board (OEB) Motion to Consider Price Paid by Natural Gas Distributors for Natural Gas Produced in Ontario.

Industrial Gas Users Association (IGUA) Intervention Request.

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's members have an interest in the proper functioning of gas supply markets and the regulatory principles applied in support thereof. At this stage it is unclear what positions will be advanced by regulated distributors, customers and Ontario gas suppliers regarding what unique regulatory principles should be applied in considering cost recovery by regulated gas distributors for natural gas produced in Ontario. As the positions and principles advanced are clarified, IGUA will assess the extent to which it has concerns and/or a perspective to contribute to the Board's deliberations in this matter.

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

Dr. Shahrzad Rahbar
President
INDUSTRIAL GAS USERS ASSOCIATION
851 Industrial Avenue, PO Box 30
Ottawa, Ontario
K1G 4L3

Office: 613-236-8021
Mobile: 613-983-2927
E-Mail: srahbar@igua.ca

Yours truly,



Ian A. Mondrow

c. S. Rahbar (IGUA)

49586535\1