

March 15, 2022

VIA RESS

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

Re: EB-2022-0072: Ontario Energy Board (OEB) Consultation to Review Annual Update to Five-Year Natural Gas Supply Plan of Enbridge Gas Inc. (EGI).

Industrial Gas Users Association (IGUA) Interest in Participating.

We write as legal counsel to IGUA and further to the Board's March 11, 2022 notice to interested parties initiating the captioned consultation. IGUA is interested in participating in this consultation and intends to participate in the Stakeholder Conference.

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

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. Finally, we note that the OEB's notice includes an update on integration of the legacy Union and EGD gas supply planning activities within the scope of this consultation, and IGUA has an interest in that as well.

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:

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Yours truly,



Ian A. Mondrow

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