

April 6, 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-2022-0011: Framework for Review of Intervenor Processes and Cost Awards.

Industrial Gas Users Association (IGUA) Request for Cost Eligibility.

Further to the Board's letter dated March 31, 2022 herein, we write as legal counsel to IGUA to advise that IGUA intends to provide comments on the issues raised in the Board's March, 2022 discussion paper, and to request that IGUA be determined eligible for recovery of its costs reasonably incurred in doing so.

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 has been regularly and actively involved in gas rate, policy and facility proceedings at the OEB for many years. Through focussing on issues of direct interest to Ontario's largest natural gas consumers, IGUA has attempted to contribute to the Board's deliberations and policy development in such matters, and hopes to continue to do so. The "rules of engagement" pursuant to which those interventions are undertaken is thus of direct interest to IGUA, and IGUA's experience in OEB processes will inform its comments and, we hope, assist the Board in its current review of intervenor processes and cost awards.

Request to Seek an Award of Costs

IGUA requests that it be determined eligible for recovery of its reasonably incurred costs of participation herein.

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*.

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

c. S. Rahbar (IGUA)
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