

July 8, 2022

**VIA RESS**

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

**Ian A. Mondrow**  
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Dear Ms. Marconi:

**Re: EB-2022-0110 – Enbridge Gas Inc. (EGI) 2021 Utility Earnings and Disposition of Deferral and Variance Account Balances Application.**

**Industrial Gas Users Association (IGUA) Request for Intervention.**

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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 Ottawa. The IGUA Board has established caucuses dedicated to providing direction to IGUA Staff and external advisors in each of Ontario and Quebec.

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 EGI's largest customers, IGUA was active in the proceedings which approved EGI's current multi-year rate plan and the 2021 rates from which the current variance and earnings sharing dispositions arise. On behalf of IGUA we have commenced our review of EGI's pre-filed evidence in respect of dispositions impacting IGUA's members, and will conclude that review and consider EGI's further filings bearing in mind the anticipated scope of the Board's consideration of EGI's application as reflected in the cost award eligibility direction provided in the Notice of Hearing.

### **Written or Oral Hearing**

We anticipate that with full pre-hearing discovery and a settlement conference, any unresolved issues arising from EGI's application could effectively proceed by way of a written hearing.

### **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)  
R. Wathy (EGI)  
D. Stevens (Aird & Berlis LLP)  
P. Prazic (OEB Staff)

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