

July 15, 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**  
Direct 416-369-4670  
ian.mondrow@gowlingwlg.com

Assistant: Cathy Galler  
Direct: 416-369-4570  
cathy.galler@gowlingwlg.com

Dear Ms. Marconi:

**Re: EB-2022-0157 – Enbridge Gas Inc. (EGI) Panhandle Regional Expansion Project.  
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 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**

Investment in EGI's Panhandle system has significantly increased in the last several years, and through the approval request advanced by EGI in this application is proposed to do so again. Under EGI's current OEB-approved cost allocation methodology the costs associated with the currently proposed expansion will materially impact IGUA's members, in particular those served on EGI's Sarnia pipeline subsystem the costs of which are currently allocated in conjunction with the costs of the Panhandle system. As such, IGUA has a particular interest in understanding and, as appropriate, providing submissions on the drivers for the proposed expansion (i.e. the issue of "need"), as well as the cost of the expansion and any viable alternatives thereto.

On behalf of IGUA we anticipate being active in all phases of the instant proceeding.

### **Written or Oral Hearing**

Pending conclusion of written discovery it is premature for us to opine on whether this matter can be effectively determined through a written process. We ask that the Board reserve that determination until interrogatory responses have been provided by EGI and any ensuing supplementary discovery process (such as a technical conference) has been completed.

### **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:

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](mailto: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](mailto:srahbar@igua.ca)

We have electronic copies of the pre-filed materials and do not require hard copies.

Yours truly,



Ian A. Mondrow

c: S. Rahbar (IGUA)  
D. Janisse (EGI)  
T. Persad (EGI)  
C. Keizer (Torys, LLP)  
Z. Crnojacki (OEB Staff)

52343921\1