

October 30, 2008

Kirsten Walli, Board Secretary  
**ONTARIO ENERGY BOARD**  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E5

Dear Ms. Walli:

**Re: EB-2008-0220: Union Gas Limited (Union) 2009 Rates.**

**Industrial Gas Users Association (IGUA) Letter of Intervention.**

We write as legal counsel to IGUA.

**Application for Intervenor Status.**

IGUA is in receipt of the Board's Notice of Application in the captioned proceeding dated October 27, 2008. We hereby request, on behalf of IGUA, that the Board accept this application for intervenor status.

**Description of IGUA.**

IGUA is an association of industrial companies located in the Canadian provinces of Manitoba, 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.

### **Nature and Scope of IGUA's Intended Participation.**

IGUA has been an active participant in Union rate proceedings in the past, on a wide variety of issues, including in the Board's recent review of Union's five year incentive regulation plan in docket EB-2007-0606. IGUA anticipates being an active intervenor on a range of issues in this application, the outcome of which may have a direct or incidental effect on industrial gas consumers.

### **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 intervention 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*.

### **Request for Written Evidence and Contact Information.**

IGUA requests that copies of written evidence and all circulated correspondence related to this matter be directed to it as follows:

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Your truly,  
**MACLEOD DIXON LLP**

  
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