

November 18, 2008

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

Dear Ms. Walli:

Re: EB-2008-0346: Consultation on the Development of Demand Side Management Guidelines for Natural Gas Distributors

Industrial Gas Users Association (IGUA) Notice of Intent to Participate and Request for Cost Eligibility.

We write as legal counsel to IGUA.

IGUA intends to participate in this consultation.

Pursuant to *Appendix A - Cost Awards* to the Board's October 31, 2008 Notice regarding this consultation, IGUA hereby requests that it be determined eligible for recovery of its reasonably incurred costs of participation in this process.

IGUA is an association of industrial companies who use natural gas in their industrial operations located in the Canadian provinces of Manitoba, Ontario and Québec. 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.

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*.

IGUA has historically been involved in rate setting matters relating to the gas distributors' DSM programs. Industrial load represents a significant component of the distributors' DSM programming, and a significant portion of the distributors' DSM budgets are spent on, and paid for, by industrial customers. As such, IGUA has an ongoing interest in the continued cost effectiveness of gas DSM programming, in the way these programs are developed and managed, and in the Board's policy in respect of gas DSM in general.

It is on this basis that IGUA makes this request for cost recovery eligibility.

IGUA requests that copies of written materials and correspondence circulated in this matter be directed to it as follows:

Ian Mondrow, Counsel
MACLEOD DIXON, LLP
Toronto Dominion Centre
500-100 Wellington Street West
Toronto, ON M5K 1H1

Phone: (416) 203 4435
Fax: (416) 360 8277
ian.mondrow@macleoddixon.com

Murray Newton, President
INDUSTRIAL GAS USERS ASSOCIATION
99 Metcalfe Street, Suite 1201
Ottawa ON K1P 6L7

Phone: (613) 236 8021
Fax: (613) 230 9531
mnewton@igua.ca

Your truly,
MACLEOD DIXON LLP



Ian A. Mondrow

c. Murray Newton, IGUA

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