

October 9, 2025

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VIA RESS

Mr. Ritchie Murray
Acting Registrar
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Mr. Murray:

Re: EB-2025-0125: Review and Evaluation of the Integrated Resource Planning Framework for Enbridge Gas.

IGUA (Late) Intention to Participate Notification.

We write as legal counsel to the Industrial Gas Users Association (IGUA).

Upon release by the OEB on October 6, 2025, of the Staff Discussion Paper, the OEB's Decision on Cost Eligibility, and a letter providing further information on next steps, all in the captioned consultation, it came to the writer's attention that we inadvertently neglected to indicate on behalf of IGUA an intention to participate in this matter in response to the OEB's initial (March 27th) letter announcing the matter. We apologize for not realizing that was requested (as indicated in the March 27th letter) by May 2nd.

IGUA does intend to participate in this consultation, and further requests that it be determined to be eligible for an award of its reasonably incurred costs of such participation.

IGUA has traditionally and consistently been determined as eligible to apply for an award of costs in accord with paragraph 3.02(a) of the OEB's *Practice Direction on Cost Awards* as a party primarily representing the direct interests of consumers (i.e. ratepayers) in relation to services that are regulated by the Board. IGUA's annual intervenor information form can be found [here](#).

We further note that IGUA has actively participated in considerations to date by the OEB in respect of the need for integrated and proactive planning by Enbridge Gas Inc. (EGI), in particular, including considerations in light of the energy transition. IGUA was a primary proponent of such an approach in EGI's 2024 rate rebasing (Phase 1) proceeding, and sponsored the evidence of Dr. Asa Hopkins

of Synapse Energy Economics, Inc.¹ therein, consideration of which figured prominently in the proceeding.

We have now noted the additional steps and dates recently scheduled in this matter. We do not believe that late recognition by the OEB of IGUA's intention to participate will prejudice any party. In light of the fact that a List of Participants has now been issued, we are copying this letter to all participants, including of course EGI in the event that EGI has any comments or concerns regarding this request.

Again, with apologies for the late notice, we would appreciate on behalf of IGUA the OEB's acceptance of IGUA's intention to participate herein and consideration of its request that it be determined eligible to apply for an award of its reasonably incurred costs of such participation.

Yours truly,



Ian A. Mondrow

c: Jacob Irving, IGUA
Nazim Sebaa, IGUA
Michael Parkes, OEB Staff
Participants

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¹ EB-2022-0200, Exhibit M8.