



From: Ontario Energy Board <webmaster@oeb.ca>
Sent: Wednesday, February 18, 2026 4:16 PM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: Ian.Mondrow <Ian.Mondrow@gowlingwlg.com>
Subject: Intervention Form: EB-2025-0295 - Industrial Gas Users Association

Intervention Form

Case Number:

EB-2025-0295

Requesting information on behalf:

Of an organization

Intervenor Name:

Industrial Gas Users Association

Mandate and Objectives:

Refer to the Frequent Intervenor Form below.

Membership of the Intervenor and Constituency Represented:

Refer to the Frequent Intervenor Form below.

Programs or Activities Carried Out by the Intervenor:

Refer to the Frequent Intervenor Form below.

Governance Structure:

Refer to the Frequent Intervenor Form below.

Representatives:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.
Refer to the Frequent Intervenor Form below.
Refer to the Frequent Intervenor Form below.

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Cost Claim Filing contact:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.
Refer to the Frequent Intervenor Form below.
Refer to the Frequent Intervenor Form below.

Other Contacts:

Refer to the Frequent Intervenor Form below. Refer to the Frequent Intervenor Form below.
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Frequent Intervenor Form:

<https://www.rds.oeb.ca/CMWebDrawer/Record/880572/File/document>

Add all individuals listed on our Frequent Intervenor Form as contacts for this proceeding:

no

Names and email addresses of individuals to be added as contacts for this proceeding:

Ian Mondrow (Ian Mondrow ian.mondrow@gowlingwlg.com); Nazim Sebaa (nsebaa@igua.ca)

OEB Proceedings:

Item Description	Category	Status
EB-2024-0198	Natural Gas – Rates	Granted
EB-2025-0163	Natural Gas – Rates	Granted
EB-2025-0125	OEB Consultations – Natural Gas	Granted
EB-2025-0073	Natural Gas – Leave to Construct	Granted

Issues:

IGUA's Ontario members are large volume customers (LVCs) of Enbridge Gas Inc. whose gas delivery rates include the costs of EGI's DSM programs. IGUA has a particular interest in the LVC DSM program, including the program opt-out proposal, which has been developed by EGI in consultation with IGUA as directed in the OEB's 2023-2025 DSM Plan Decision [EB-2021-0002]. As representative of Ontario industrial gas consumers whose emissions are directly regulated, IGUA has a further particular interest in the topic of the "social cost of carbon" which the OEB has indicated is to be considered in the current proceeding.

Policy Interests:

N/A

Hearings:

EGI has proposed an oral hearing in this matter. IGUA agrees with that proposal.

Evidence:

IGUA is unable to determine at this time whether it will seek to file evidence in this proceeding. Depending on how the record herein develops, IGUA may consider seeking leave to file evidence related to the emissions (including carbon) regulation directly applicable to its members and the extent to which that regulatory regime renders compulsory DSM programming and cost contribution redundant and economically inefficient. IGUA is considering the extent to which a record on this topic can be developed through interrogatories and otherwise, and will reassess the value of filing additional evidence as development of the record herein proceeds.

Coordination with Other Intervenors:

As a regular intervenor in OEB matters, including in particular natural gas matters, IGUA regularly works in coordination with other regular intervenors to avoid unnecessary and undue duplication of efforts and activities, and fully intends to continue to do so in this proceeding. As a matter of practice, IGUA tends to focus on aspects of EGI applications unique to, or

which have a particular impact on, large industrial customers, or matters impacting the OEB's ongoing approach to adjudication which have continuing impacts on the veracity and conduct of OEB processes in which IGUA engages. In respect of the instant application, as was determined by the OEB in EB-2024-0198 in respect of EGI's 2024 multi-year DSM Plan filing (see Decision on Issues List and Procedural Order No. 2, April 10, 2025, page 20), IGUA's members' gas consumption levels and end uses, and EGI's LVC DSM program, are all unique to IGUA's members and similarly situated large volume industrial gas customers. To this extent IGUA's interest in, and perspective regarding, the matters in this application are unique to it.

Cost Awards:

IGUA requests that it be determined eligible to apply for an award of its costs reasonably incurred herein. As representative of the direct interests of EGI's largest volume ratepayers in relation to services regulated by the Board, IGUA has generally been determined eligible to apply for a cost award pursuant to paragraph 3.03(a) of the OEB's Practice Direction on Cost Awards.

Language Preference:

N/A