

January 14, 2009

Ms. Kirsten Walli, Board Secretary
ONTARIO ENERGY BOARD
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Ms. Walli:

Re: EB-2008-0408: Consultation on Transition to International Financial Reporting Standards and Consequent Amendments to Regulatory Instruments.

IGUA Notice of Intent to Participate and Request for Cost Eligibility.

We write as legal counsel to IGUA.

Notice of Intent to Participate.

Pursuant to the Board's December 23, 2008 notice to interested parties regarding this consultation, IGUA hereby provides notice of its intent to participate in this consultation. IGUA intends to attend the issues meeting scheduled for January 27th.

Request for Cost Eligibility.

IGUA also hereby requests that it be determined eligible for recovery of its reasonably incurred costs of participation in this consultation, in accord with directions regarding costs herein provided by the Board from time to time.

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 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*.

As noted in the Board's notice regarding this consultation, the adoption of IFRS is expected to change the manner in which utilities perform their accounting and the reporting of their financial results, and this may create impacts on distribution rates or other charges. As a representative of industrial ratepayers, IGUA has an interest in review, identification and amelioration of any such impacts. As an intervenor regularly active in gas distribution rate applications and related proceedings before this Board, IGUA hopes to be able to contribute to the Board's review and direction regarding IFRS related changes to regulatory accounting, reporting and filing standards associated with such processes.

IGUA notes the Board's advice that it intends to retain a consultant to produce a report summarizing various IFRS issues and implications, as well as relevant experience of other jurisdictions. The Board has asked that parties seeking cost eligibility indicate whether costs for a separate expert report should be considered for this consultation. In addition to the possibility of a separate report, access by ratepayer representatives to expert advice could be of significant assistance in enabling a full understanding of what might be relatively complex and esoteric regulatory accounting issues. IGUA anticipates further discussion of the purpose and advisability of such a retainer, and the potential coordination of such a retainer with the work to be undertaken by the Board's expert, at the upcoming issues meeting. In the interim, IGUA respectfully suggests that the Board leave open the opportunity for recovery of costs for a separate expert retained by ratepayer interests.

Contact information.

IGUA requests that all correspondence and filings in this process be directed to it as follows:

Ian Mondrow, Counsel
MACLEOD DIXON LLP
Toronto-Dominion Centre
Canadian Pacific Tower
500-100 Wellington Street West
Toronto ON M5H 1K1

Phone: 416 203 4435
ian.mondrow@macleoddixon.com

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

Phone: 613 236 8021
mnewton@igua.ca

Yours truly,
MACLEOD DIXON LLP



Ian A. Mondrow

c. Murray Newton, IGUA
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