

April 25, 2023

VIA RESS

Ms. Nancy Marconi Registrar **ONTARIO ENERGY BOARD** P.O. Box 2319, 27<sup>th</sup> Floor 2300 Yonge Street Toronto, Ontario M4P 1E4

Dear Ms. Marconi:

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Assistant: Cathy Galler Direct: 416-369-4570 cathy.galler@gowlingwlg.com

# Re: EB-2023-0072 – Consultation to Review 2023 Annual Update to Five-Year Natural Gas Supply Plan of Enbridge Gas Inc.

## Industrial Gas Users Association (IGUA) Intent to Participate.

We write as legal counsel to IGUA to indicate IGUA's intent to participate in this consultation.

We appreciate that this letter of intent to participate is being filed several days past the date for such filing indicated in the OEB's April 12<sup>th</sup> letter to interested parties providing notice of this consultation. As no further steps in this matter have yet been taken, IGUA's measured (see below) participation should not cause prejudice or inconvenience to any party.

## Description of IGUA

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

The Association's activities are guided by a 15 member Board of Directors, constituted to assure that each industrial sector and geographic region is represented. The Board of Directors has regularly scheduled meetings at least six times each year. A full time President and other staff are based in

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Ottawa. The IGUA Board has established caucuses dedicated to providing direction to IGUA Staff and external advisors in each of Ontario and Quebec.

Through regulatory intervention, government advocacy, marketing, promotion, partnerships, education and outreach, IGUA successfully represents industrial gas users. Our mission is to be the voice of our members within the natural gas industry through intervention, advocacy, and partnerships.

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

We have reviewed EGI's 2023 Annual Gas Supply Plan Update (March 1, 2023) and have monitored correspondence from interested parties and the OEB regarding the appropriate scope of this consultation. We have reviewed, and will be governed by, the scope determination and associated directions provided by the OEB in its April 12<sup>th</sup> notice letter.

IGUA's members use very little system gas and generally take unbundled service. Our intention in this process on behalf of IGUA is to confirm the extent to which costs associated with the Vector contracts that are subject to review in this process are incurred in support of, and allocated to, unbundled direct purchase customers. Following clarification of that topic we will be able to assess the extent of IGUA's continuing interest in this matter.

#### Intention to Seek an Award of Costs

IGUA hereby requests that it be determined eligible for recovery of its reasonably incurred costs of its participation in this matter as noted above.

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 to Receive Filings and Contact Information**

IGUA requests that copies of all filings herein be directed to it as follows:

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Yours truly,

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c: S. Rahbar (IGUA) Richard Wathy (EGI) David Stevens (Aird & Berlis LLP) Petar Prazic (OEB Staff)

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