

PETER C.P. THOMPSON, Q.C.
T 613.787.3528

pthompson@blg.com

Borden Ladner Gervais LLP
World Exchange Plaza
100 Queen St, Suite 1100
Ottawa, ON, Canada K1P 1J9
T 613.237.5160
F 613.230.8842
F 613.787.3558 (IP)
blg.com



By electronic filing

March 12, 2012

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th floor
Toronto, ON M4P 1E4

Dear Ms Walli,

Designation Proceeding for the East-West Tie Line

Board File No.: EB-2011-0140

Our File No.: 339583-000003

We are writing to seek intervenor status and cost award eligibility in this proceeding on behalf of Canadian Manufacturers & Exporters (“CME”). The request for this relief is late because we inadvertently failed to catch the February 2, 2012 Notice of Proceeding posted on the Board’s website on or about February 2, 2012. At that time, the writer was out of the country on holidays and only became aware of this proceeding on Friday, March 9, 2012, when a representative of the Consumers Council of Canada (“CCC”) forwarded a copy of Procedural Order No. 1 in this proceeding to his attention.

This proceeding is an important one for CME members who are very interested in assuring that the criteria that the Board applies in connection with major features of Ontario’s Long-Term Energy Plan (“LTEP”), such as the East-West Tie Line, accord a high priority to the achievement of an outcome that does not harm the competitiveness of manufacturers located throughout Ontario.

The rationale for CME’s request for intervenor status and for cost eligibility is set out below.

Request for Intervenor Status

The reasons why CME should be granted intervenor status in this proceeding include the following:

1. CME is Canada’s leading business network. Its members represent 75% of manufactured output in the Province of Ontario, and 90% of all exports.
2. Manufacturing is important to the Province of Ontario. It is the single largest sector of the economy (17.5% of Gross Domestic Product (“GDP”) or \$300B) employing, directly, over 1M people in the Province.

3. Electricity is the primary source of energy for the manufacturing sector. As a result, the members of CME are vitally concerned with all matters pertaining to the supply and price of electricity.
4. Ontario-based CME members seek an electricity system for Ontario which is one of the most cost-effective and economically sustainable systems in North America.
5. CME's objective in this proceeding is to advocate for an outcome that does not harm the competitiveness of its manufacturer members located throughout Ontario.

Request for Cost Award Eligibility

CME seeks a determination that it is eligible for a Cost Award on the following grounds:

1. CME is a not-for-profit organization funded by membership fees and revenues from the services it renders to Federal and Provincial Governments and Agencies to foster the development of national and international markets for its members and to break down trade barriers.
2. About 85% of CME's 1,400 Ontario-based member companies are Small to Medium sized business Enterprises ("SMEs") with 500 employees or less. The views of these businesses should be considered in this proceeding.
3. CME's ability to actively participate in this proceeding is dependent upon a determination that it is eligible for a Cost Award. In many prior proceedings, the Board has determined that CME is eligible for a Cost Award.

No Prejudice

CME submits that no one will be prejudiced if the Board grants the relief CME seeks.

CME Contacts

If the relief requested in this letter is granted, then CME requests that further communications with respect to this matter be sent to the following:

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| <p>Paul Clipsham Director of Policy - Ontario Division Canadian Manufacturers & Exporters 6725 Airport Road Suite 200 Mississauga ON L4V 1V2</p> <p>Tel 289.566.9538 Fax 905.672.1764 e-mail paul.clipsham@cme-mec.ca</p> | <p>Borden Ladner Gervais LLP Barristers & Solicitors 100 Queen Street Suite 1100 Ottawa ON K1P 1J9</p> <p>Peter C.P. Thompson Tel 613.787.3528 Fax 613.230.8842 e-mail pthompson@blg.com</p> | <p>Vincent J. DeRose Tel 613.787.3589 Fax 613.230-8842 e-mail vderose@blg.com</p> | <p>Jack Hughes Tel 613.787.3509 Fax 613.230-8842 e-mail jhughes@blg.com</p> |
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We are taking the liberty of sending a copy of this late intervention request to all parties listed in Appendix A to Procedural Order No. 1 dated March 9, 2012. We are doing this so that the transmitters listed therein will have an opportunity to consider CME's request for cost eligibility before the March 16, 2012 deadline for responding to the requests made by the 11 parties listed in Procedural Order No. 1 seeking such relief.

Please advise us if any further information is required to support this belated request for intervenor status.

Yours very truly,



Peter C.P. Thompson, Q.C.

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c. Intervenor EB-2011-0140
Paul Clipsham (CME)

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