

March 25, 2019

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

By electronic filing

Dear Ms. Walli

**Re: Staff Report to the Board: Rate Design for Commercial and Industrial Customers to Support an Evolving Electricity Sector**  
**Board File #: EB-2015-0043**

We are writing to seek intervenor status and cost award eligibility in this proceeding on behalf of Canadian Manufacturers & Exporters (“CME”).

**1. CME and its Interest in this Proceeding**

CME is Canada’s leading business network. Its members represent 75% of manufactured output in the Province of Ontario, and 90% of all exports. 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. 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.

CME’s mandate and objectives, its membership and the constituency it represents, and the types of programs and activities by which it carries out its mandate, are described on CME’s website, [www.cme-mec.ca](http://www.cme-mec.ca). CME’s priority objectives related to Energy and the Environment are summarized in Attachment 1.

Electricity is a significant source of energy for the manufacturing sector. As a result, Ontario-based CME members seek an electricity system for Ontario that is one of the most reliable, cost effective and economically sustainable systems in North America.

CME wishes to actively participate in this proceeding to ensure that any rate structure changes which the Board approves, in combination with any other consequences that may result, are affordable and capable of sustaining Ontario’s manufacturing sector.

## 2. Nature and Scope of CME's Intended Participation

CME intends to participate actively in this proceeding for the purpose of:

- (a) Attending the stakeholder meeting and reporting to the CME;
- (b) Reviewing the staff research paper and providing written comments to assure that all relevant facts are put forward for the Board's consideration.

## 3. Request for Materials

CME requests that an electronic copy of the materials relevant to this consultation be sent to its representative. CME does not require a hard copy of this material.

## 4. Request for Cost Eligibility

CME intends to seek a cost award in this proceeding on the grounds that its ability to participate is dependent upon a determination that it is eligible for such an award. In many prior proceedings, the Board has determined that CME is eligible for a Cost Award.

## 5. Strapolec's Representation of CME

Strategic Policy Economics ("Strapolec") represents CME under the auspices of a written retainer agreement executed by CME's Ontario Division. Strapolec's mandate is to represent the interests of manufacturers in those Ontario Energy Board ("OEB") consultations and proceedings which may have an impact on the rates which Ontario manufacturers pay for utility services. Alex Greco, Director, Manufacturing Policy of CME, is the individual with whom Strapolec liaises.

## 6. CME Contacts

If the relief sought in this letter is granted, then CME requests that further communications with respect to this matter be sent to the following individuals. Please take note of the new information highlighted below for ease of reference:

Alex Greco Director, Manufacturing Policy Canadian Manufacturers & Exporters 55 Standish Court, Suite 620 Mississauga, ON L5R 4B2  Tel (905) 672-3466 Fax (905) 672-1764 email <a href="mailto:alex.greco@cme-mec.ca">alex.greco@cme-mec.ca</a>	Marc Brouillette Principal Consultant Strategic Policy Economics 148 Westminster Avenue Toronto, ON M6R 1N7  Tel (416) 564-4185 email <a href="mailto:marc@strapolec.ca">marc@strapolec.ca</a>
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Please contact the undersigned if the Board requires any further information in connection with these requests.



Yours very truly

**Strategic Policy Economics**

A handwritten signature in black ink, appearing to read "Marc Brouillette".

Marc Brouillette  
Principal Consultant  
marc@strapolec.ca

enclosure

c. Alex Greco, CME

## **Attachment 1**

### **About CME**

Canadian Manufacturers & Exporters (“CME”) is Canada’s leading business network. It represents more than 10,000 leading companies nationwide and through various initiatives, touches more than 100,000 companies from coast-to-coast, engaged in manufacturing, international trade, and service-related industries. More than 85% of its members are Small to Medium sized Enterprises (“SMEs”). In Ontario, CME has about 1,400 members representing about 75% of manufactured output and about 90% of all exports.

One of CME’s priorities is to improve the business climate for manufacturers. Initiatives pertaining to Energy and the Environment fall within the scope of this objective and include efforts by CME to ensure that its members enjoy continued access to a reliable and cost competitive supply of energy and electricity across Canada.

In this context, CME seeks an Ontario electricity system for its members which is reliable, affordable, cost effective and economically sustainable with electricity prices for Ontario manufacturers which are competitive with electricity prices available to manufacturers located elsewhere.

For further information on CME, please visit their website at [www.cme-mec.ca](http://www.cme-mec.ca).