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Our File # 339583-000003

By electronic filing

May 22, 2020

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Long,

**Re: Consultation on the Deferral Account – Impacts Arising from the COVID-19
Emergency
Board File #: EB-2020-0133**

We are writing to seek intervenor status and cost award eligibility in this consultation 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 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. CME’s priority objectives related to Energy and the Environment are summarized in Attachment 1.

CME members often run energy intensive businesses, which use both electrical power and natural gas as an essential inputs. As a result, CME members are vitally concerned with all

matters pertaining to the supply and price of electricity and natural gas. Account 1509 – Impacts Arising from the COVID-19 Emergency, as well as the three related subaccounts allow utilities to track incremental costs and lost revenues as a result of COVID-19. These amounts could potentially be recovered from ratepayers, including CME’s membership. Accordingly, the outcome of this proceeding will have direct and significant consequences for CME’s membership during an already challenging time.

2. Nature and Scope of CME’s Intended Participation

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

- (a) Assuring that all relevant facts are placed in evidence for the Board’s consideration;
- (b) Making submissions regarding the full scope of the Board’s consultation, including:
 - (i) The rules and operations of the COVID-19 sub-accounts;
 - (ii) The appropriate costs to be recorded in the account;
 - (iii) The timing of recovery, mitigation measures, and their potential impacts on small to medium size enterprises;
 - (iv) The inclusion of other revenues and offsets into the calculations of the account;
 - (v) The appropriate calculation of materiality.
- (c) Such further and other matters as counsel may advise and the Board permits.

3. Request for Documents

CME requests that an electronic copy of the consultation documents be provided to its counsel. 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. BLG’s Representation of CME

Borden Ladner Gervais (“BLG”) represents CME under the auspices of a written retainer agreement executed by Ian Howcroft, Vice-President of CME’s Ontario Division. BLG’s mandate is to represent the interests of manufacturers in those Ontario Energy Board (“OEB”) proceedings which are likely to have an impact on the reliability, quality of service, and/or rates for electricity and natural gas distribution services provided to manufacturers. Alex Greco, Director, Manufacturing Policy, of CME, is the individual with whom BLG 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:

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 alex.greco@cme-mec.ca	Borden Ladner Gervais LLP Barristers & Solicitors 100 Queen Street Suite 1300 Ottawa ON K1P 1J9 Main Tel: 613.237.5160 Main Fax: 613.230.8842	Emma Blanchard Tel 613.369.4755 Email eblanchard@blg.com Scott Pollock Tel 613.787.3541 Email spollock@blg.com
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Please contact the undersigned if the Board requires any further information in connection with these requests.

Yours very truly,



Scott Pollock

enclosure

c. Alex Greco (CME)

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Attachment 1

About CME and Its Representation in OEB Proceedings

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 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.

Similarly, CME seeks a secure supply of natural gas at burner-tip prices in the plants of Ontario manufacturers which are competitive with such prices for manufacturers located elsewhere.

For further information on CME, please visit their website at www.cme-mec.ca.

CME’s authorized representative in proceedings before the Ontario Energy Board (the “Board” or “OEB”) is Borden Ladner Gervais LLP (“BLG”) represented by Emma Blanchard and Scott Pollock, with support from other BLG associates. BLG’s representation of CME in proceedings before the Board is pursuant to a written retainer agreement executed on behalf of CME by Ian Howcroft, Vice-President – Ontario Division of CME.

BLG’s mandate is to represent the interests of manufacturers in those OEB proceedings which are likely to 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 BLG representatives liaise.