



By electronic filing and by e-mail

September 15, 2009

Kirsten Walli
Board Secretary
Ontario Energy Board
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Dear Ms Walli,

**Hydro One Networks Inc. ("Hydro One")
2010 and 2011 Distribution Rate Application**

Board File No.: EB-2009-0096
Our File No.: 339583-000044

Pursuant to Procedural Order No. 1 dated September 9, 2009, we are writing to provide the comments of Canadian Manufacturers & Exporters ("CME") on the Proposed Issues List for Hydro One Network's ("Hydro One") 2010 and 2011 Distribution Rates Application.

We have had the benefit of reviewing the comments of Consumers Council of Canada ("CCC") and the Vulnerable Energy Consumers Coalition ("VECC"). CME supports the comments provided by CCC and VECC.

That said, CME wishes to specifically address two issues raised by CCC and VECC. First, the Board has requested in Procedural Order No. 1 that parties identify which issues should be considered on a written basis and which should be considered in an oral hearing. CME submits that, at this time, all issues should be subject to an oral hearing process. Once the Interrogatory process has been completed, then the parties may be in a position to identify issues which can appropriately be dealt with in writing. As pointed out by CCC, the identification of those issues that can be appropriately dealt with in writing has historically occurred at the Settlement Conference. CME supports this approach.

Second, CME shares the concerns of CCC and VECC with respect to the broader policy issues raised by Hydro One's Green Energy Plan. CME urges the Board to consider whether the broader policy issues would best be addressed in a generic proceeding rather than in Hydro One's current Application. Such a generic proceeding would ensure that the Board's policies relating to the *Green Energy Act* are consistent and appropriate for all LDCs across the province.

If you have any questions or concerns, please feel free to contact me.

Yours very truly,

Vincent J. DeRose

VJD\slc
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Intervenors EB-2009-0096
Paul Clipsham (CME)

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