

March 24, 2010

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

Dear Ms Walli,

Consultation on Distribution Revenue Decoupling

Board File No.:

EB-2010-0060

Our File No.:

339583-000065

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

Request for Intervenor Status

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

- (i) CME is Canada's leading business network. Its members represent 75% of manufactured output in the Province of Ontario, and 90% of all exports;
- (ii) 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;
- (iii) The supply and cost of electricity and natural gas have a direct and significant impact on manufacturing in the province of Ontario. As a result, the members of CME are vitally concerned with all matters pertaining to the supply and price of electricity and natural gas;
- (iv) CME's primary concern, in this proceeding, is the impact that the various revenue adjustment mechanisms for decoupling true up plans may have on the supply and/or cost of electricity and natural gas in Ontario; and
- (v) CME wishes to actively participate in this proceeding and believes that it can provide valuable contributions in the Board's assessment of revenue adjustment and cost recovery mechanisms that are currently available to electricity and natural gas distributors to address revenue erosion resulting from unforecasted changes in the volume of energy sold.

Request for Cost Award Eligibility

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

- (i) 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;
- (ii) About 85% of CME's 1,200 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 these proceedings; and
- (iii) 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.

CME Contacts

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

Paul Clipsham
Director of Policy
Ontario Division
Canadian Manufacturers & Exporters
6725 Airport Road
Suite 200
Mississauga ON L4V 1V2

Tel (289) 566-9538 Fax (905) 672-1764 E-mail paul.clipsham@cme-mec.ca Borden Ladner Gervais LLP Barristers & Solicitors Suite 1100 - 100 Queen Street Ottawa ON K1P 1J9

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Please contact the undersigned if the Board requires any further information in connection with these requests.

Vincent J. DeRose

VJD

e. Paul Clipsham (CME)

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