

By electronic filing and by e-mail

June 8, 2010

Kirsten Walli
Board Secretary
Ontario Energy Board
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Dear Ms Walli,

**Union Gas Limited ("Union")
2011 Natural Gas Demand Side Management ("DSM") Plan
Board File No.: EB-2010-0055
Our File No.: 339583-000074**

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

We recognize that our request for intervenor status is late. I have discussed the circumstances of our late request for intervention status with Mr. Chris Ripley of Union, and he has confirmed that Union does not oppose the Board granting intervenor status to 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) Natural gas is significant to manufacturing as one of the sources 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.
- (iv) Ontario-based CME members have an interest in conservation and DSM. Furthermore, CME has been a long standing member of Union's Evaluation and Audit Committee. As such, CME believes it can contribute to the Board's review of the proposed 2011 DSM Plan.
- (v) CME wishes to actively participate in these proceedings to ensure that Union's 2011 DSM Plan is compatible with the current DSM Framework and that the total 2011 DSM budget of \$20.89M is reasonable.



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 1,400 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.
- (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 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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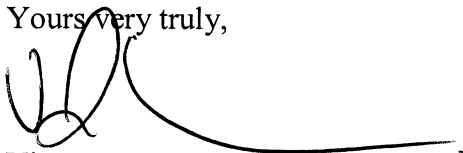
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Please contact the undersigned if the Board requires any further information in connection with these requests.

Yours very truly,



Vincent J. DeRose

VJD

c. Chris Ripley (Union)
Paul Clipsham (CME)

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