

August 30, 2010

Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street 27th floor Toronto, ON M4P 1E4 Borden Ladner Gervais LLP Lawyers • Patent & Trade-mark Agents World Exchange Plaza 100 Queen Street, Suite 1100 Ottawa ON K1P 1J9 tel.: (613) 237-5160 fax: (613) 230-8842 www.blgcanada.com

> VINCENT J. DEROSE direct tel.: (613) 787-3589 e-mail: vderose@blgcanada.com

Dear Ms Walli,

Initiative to Develop Electricity Distribution System Reliability StandardsBoard File No.:EB-2010-0249Our File No.:339583-000083

We are writing this letter to seek participant status and cost award eligibility in this proceeding on behalf of Canadian Manufacturers & Exporters ("CME"). In so doing, CME wishes to participate in the stakeholder conference and the preparation of written submissions.

Request for Participant Status

The reasons why CME should be granted participant 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) Electricity is the primary source 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 seek an electricity system for Ontario which is one of the most cost-effective and economically sustainable systems in North America.
- (v) CME members are concerned with regulatory requirements imposed by the Board that seek to reinforce and strengthen the responsibility of Ontario electricity distributors to provide reliable delivery of electricity, particularly to the extent that such regulatory requirements impact distributor investment planning decisions. For this reason, CME wishes to participate in all aspects of this consultation process.

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:

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 100 Queen Street Suite 1100 Ottawa ON K1P 1J9

Peter C.P. Thompson, Q.C. Tel (613) 787-3528 Fax (613) 230-8842 E-mail pthompson@blgcanada.com

Vincent J. DeRose Tel (613) 787-3589 Fax (613) 230-8842 E-mail vderose@blgcanada.com

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

Yours very truly,

Vincent J. DeRose

VJD c. Paul Clipsham (CME)

OTT01\4165081\1