

By Email

October 4, 2010

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

Dear Ms Walli

Customer Service Amendments to the Gas Distribution Access Rule

Board File: EB-2010-0280

Our File: 339583-000003

We are writing this letter to seek cost award eligibility in this proceeding for our client, Canadian Manufacturers & Exporters (“CME”).

We recognize that this Consultative deals with primarily with matters pertaining to amendments that the Board is contemplating to the Gas Distribution Access Rule (“GDAR”) and will be focused primarily on Customer Service Rules applicable to Low Income Customers.

Rule changes that are made to accommodate Low Income Customers are likely to have cost consequences for other customer classes. In these circumstances, CME wishes to participate in this consultative to assure that the cost consequences for other customer classes of the various alternatives the Board considers are given appropriate weight in the process. Accordingly, CME seeks a determination that it is eligible for a cost award in this proceeding and in support thereof, relies upon the following additional grounds:

1. CME is Canada’s leading business network. Its members represent 75% of manufactured output in the Province of Ontario, and 90% of all exports.
2. 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.
3. Electricity and natural gas are significant 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 and natural gas.

4. CME wishes to participate in this proceeding to determine the impact on electricity consumers of the new rates and fees related to distribution generation projects that Hydro One asks the Board to approve.
5. 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.
6. 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. **Please note the change in our e-mail addresses.**

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

Yours very truly,



Peter C.P. Thompson, Q.C.

PCT\slc
c. Paul Clipsham (CME)
Vince DeRose

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