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## By electronic filing

March 29, 2011

Kirsten Walli Board Secretary Ontario Energy Board 27<sup>th</sup> floor – 2300 Yonge Street Toronto, ON M4P 1E4

Dear Ms Walli,

Preliminary Assessment of Incentive Regulation Plans of the Natural Gas Utilities

**Board File No.:** 

EB-2011-0052

Our File No.:

339583-000003

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

CME's request for this relief is late. We inadvertently did not file our letter of intervention. We thank Board Staff for bringing this matter to our attention. We submit that the granting of late intervention will have no impact on the schedule of the consultation, and therefore, no parties will be prejudiced.

## Request for Participant Status

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

- 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. Natural gas is a significant 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 natural gas.
- 4. CME wishes to actively participate in this consultation to assess the multi-year incentive regulation plans for Enbridge Gas Distribution Inc. and Union Gas Limited.

## Request for Cost Award Eligibility

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



- 1. 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.
- 2. 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.
- 3. 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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Please contact the undersigned if the Board requires any further information in connection with these requests.

Yours-very truly,

Vincent J. DeRose

Paul Clipsham

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