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**By electronic filing**

October 27, 2011

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

Dear Ms Walli,

**Enbridge Gas Distribution Inc. ("Enbridge")**  
**Renewable Natural Gas Application**  
**Board File No.: EB-2011-0242**  
**Our File No.: 339583-000122**

We submitted a request for intervenor status on behalf of Canadian Manufacturers & Exporters ("CME") on October 13, 2011, a date prior to the issuance of the Notice of Application herein.

Pursuant to paragraph 1 of that Notice, we are enclosing a further copy of CME's request for intervenor status and cost award eligibility in this proceeding.

Please note that the contact name for CME should revert back to **Paul Clipsham** as follows:

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

Yours very truly,  
**Borden Ladner Gervais LLP**

Jack Hughes

enclosure

c. Norm Ryckman (Enbridge)  
Fred Cass (Aird & Berlis LLP)  
Paul Clipsham (CME)  
Nancy Coulas (CME)

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October 13, 2011

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

Dear Ms Walli,

**Enbridge Gas Distribution Inc. ("Enbridge")  
Renewable Natural Gas Application  
Board File No.: EB-2011-0242**

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:

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 1 million people in the Province.
3. 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 natural gas commodity, including its transmission and distribution.

**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 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.

Written or Oral Hearing

As noted by the School Energy Coalition ("SEC"), it is premature to assess whether an oral or written hearing is more appropriate in this proceeding until interrogatories have been answered.

CME Contacts (Updated and Revised)

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:

<b>Nancy Coulas</b> <b>Director, Environment &amp; Energy Policy</b> <b>Canadian Manufacturers &amp; Exporters</b> <b>1 Nicholas Street</b> <b>Suite 1500</b> <b>Ottawa ON K1N 7B7</b>  <b>Tel 613.238.8888 x 4234</b> <b>Fax 613.563.9218</b> <b>e-mail nancy.coulas@cme-mec.ca</b>	<b>Borden Ladner Gervais LLP</b> <b>Barristers &amp; Solicitors</b> <b>100 Queen Street</b> <b>Suite 1100</b> <b>Ottawa ON K1P 1J9</b>  <b>Peter C.P. Thompson</b> <b>Tel 613.787.3528</b> <b>Fax 613.230.8842</b> <b>e-mail pthompson@blg.com</b>	<b>Vincent J. DeRose</b> <b>Tel 613.787.3589</b> <b>Fax 613.230-8842</b> <b>e-mail vderose@blg.com</b>	<b>Jack Hughes</b> <b>Tel 613.787.3509</b> <b>Fax 613.230-8842</b> <b>e-mail jhughes@blg.com</b>
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Please contact the undersigned if the Board requires any further information in connection with these requests.

Yours very truly,  
**Borden Ladner Gervais LLP**

  
Jack Hughes

cc. Norm Ryckman (Enbridge)  
Fred Cass (Aird & Berlis LLP)  
Nancy Coulas (CME)

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