

By E-mail

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March 13, 2008

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

Dear Ms Walli,

Ontario Power Generation Inc. ("OPG")Board File No.:EB-2007-0905Our File No.:339583-000001

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

CME's request for this relief is late. The Notice of Application herein is dated December 10, 2007. Procedural Order No. 1 issued on January 24, 2008, and the processes described in paragraphs 1 to 4 thereof have already been completed.

CME's wish to actively participate in this proceeding is prompted, in part, by presentations made by representatives of Ontario Power Generation Inc. ("OPG"), Hydro One Networks Inc. ("Hydro One"), and others at a CME sponsored conference held in Toronto on February 20, 2008, entitled "Navigating Ontario's Energy Future".

As a result of presentations made at that conference, CME concluded that it should take steps to more actively represent the interests of its about 1,200 Ontario-based member companies in Ontario Energy Board ("OEB" or the "Board") proceedings such as this one, the outcome of which will have a material impact on rates CME member companies pay for electricity.

## 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.

- 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 significant to manufacturing, as 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's primary concern, in this proceeding, is the level of the rate increases OPG seeks and the impact such rate increases will have on the energy costs of its members.
- (vi) CME wishes to actively participate in these proceedings to assure that any rate changes which the Board approves are just and reasonable. Just and reasonable rates are a necessary ingredient of an electricity system that will support a growing and prosperous manufacturing sector.

## 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 1,200 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 these proceedings.
- (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.

## No Prejudice

If the relief requested in this letter is granted, then CME will not be seeking any changes to any of the deadline dates specified in paragraphs 5 to 11 of Procedural Order No. 1. Accordingly, it is submitted that no one will be prejudiced if the Board grants the relief CME seeks.

## CME Contacts

If the relief requested 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

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

Yours very truly,

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Peter C.P. Thompson, Q.C.

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c. Ontario Power Generation Inc. Interested Parties EB-2007-0905 Paul Clipsham (CME)

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