

PETER C.P. THOMPSON, Q.C.  
T 613.787.3528  
pthompson@blg.com

Borden Ladner Gervais LLP  
World Exchange Plaza  
100 Queen St, Suite 1100  
Ottawa, ON, Canada K1P 1J9  
T 613.237.5160  
F 613.230.8842  
blg.com



**By electronic filing**

April 11, 2013

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

Dear Ms Walli,

**Union Gas Limited ("Union")**  
**Brantford-Kirkwall/Parkway D Project**  
**Board File No.: EB-2013-0074**  
**Our File No.: 339583-000003**

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

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 1M people in the Province.
3. Natural gas is an important 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 cost of natural gas.
4. CME wishes to participate in these proceedings to understand the impact which the proposed natural gas pipeline facilities and the new long-term transportation contracts will have on manufacturers throughout Ontario. To this end, CME has an interest in ensuring that the costs ratepayers incur for transmission and distribution of natural gas are just and reasonable. Just and reasonable rates are necessary to 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:

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:

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 email paul.clipsham@cme-mec.ca	Borden Ladner Gervais LLP Barristers & Solicitors 100 Queen Street Suite 1100 Ottawa ON K1P 1J9  Main Fax (613) 230-8842	Peter C.P. Thompson Tel (613) 787-3528 email pthompson@blg.com  Vincent J. DeRose Tel (613) 787-3589 email vderose@blg.com  Kim Dullet Tel (613) 369-4792 email kdullet@blg.com
---	--	---

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.

c. Karen Hockin (Union Gas)  
Crawford Smith (Torys)  
Paul Clipsham (CME)

OTT01: 5616236: v1