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## By electronic filing

June 13, 2013

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

Dear Ms Walli,

Hydro One Networks Inc. ("Hydro One") 3GIRM 2014 Distribution Rate Application

Board File No.: EB-2013-0141 Our File No.: 339583-000003

We are writing this letter to seek intervenor status and cost award eligibility in this proceeding on behalf of Canadian Manufacturers & Exporters ("CME"). We seek the indulgence of the Board and the parties for our failure to submit this request by Monday, June 10, 2013.

I was engaged in an Energy Conference on June 6 and 7, and in a Consultative process before the Board on June 10 and 11, 2013. As a result, I inadvertently failed to instruct my assistant to file this request on June 10, 2013.

## 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. Electricity is 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.
- 4. Ontario-based CME members seek an electricity system for Ontario that is one of the most cost-effective and economically sustainable systems in North America.
- 5. CME wishes to actively participate in this proceeding to:
  - (a) verify that the requested rate increases are compatible with the Board's Incentive Regulation Mechanism ("IRM") guidelines; and



(b) evaluate the impact that the requested rate changes will likely have, in combination with other increases in electricity prices, on the affordability of electricity for Ontario's 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:

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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.

c. Jamie Waller (Hydro One) Paul Clipsham (CME)

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