VINCENT J. DEROSE direct tel.: (613) 787-3589 e-mail: vderose@blgcanada.com

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

Dear Ms Walli,

## Ontario Energy Board ("OEB")

Commodity Pricing, Load Balancing and Cost Allocation Methodologies for Natural Gas Distributors in Relation to Regulated Gas Supply

**Board File No.:** 

EB-2008-0106

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").

## 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.
- (ii) 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) 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.
- (iv) Ontario-based CME members seek a natural gas distribution system for Ontario which is cost-effective and economically sustainable.
- (v) CME's primary concern, in this proceeding, will be the methodology for load balancing and the cost allocation between delivery and gas supply across gas distributors.

;

Saloary .

Montréal

## 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.

## **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

Tel (905) 672-3466 ext. 3236 Fax (905) 672-1764 E-mail paul.clipsham@cme-mec.ca Borden Ladner Gervais LLP Barristers & Solicitors 100 Queen Street Suite 1100 Ottawa ON K1P 1J9

Peter C.P. Thompson, Q.C. Tel (613) 787-3528 Fax (613) 230-8842 E-mail pthompson@blgcanada.com

Vincent J. DeRose Tel (613) 787-3589 Fax (613) 230-8842 E-mail vderose@blgcanada.com

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

Yours very truly,

Vincent J. DeRose

VJD\slc

c. Patrick Hoey (Enbridge Gas Distribution Inc.)
Mark Kitchen (Union Gas Limited)

Chuck Hindley (Natural Resource Gas Limited)

Paul Clipsham (CME)

OTT01\3475528\1