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Our File # 339583-000003

By electronic filing

June 3, 2015

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

Dear Ms. Walli

Re:

Consultation on the Regulatory Treatment of Pensions and

Other Post-Employment Benefit (OPEBs) Costs

Board File #: El

EB-2015-0040

We are writing to register the interest of Canadian Manufacturers & Exporters ("CME") in this consultation and to seek cost award eligibility. We apologize that this request is being submitted after the May 21, 2015 deadline. However, as initial comments are due on June 26, 2015 no party will be prejudiced by our late request.

### 1. CME and its Interest in this Proceeding

CME is Canada's leading business network. Its members represent 75% of manufactured output in the Province of Ontario, and 90% of all exports. 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. 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.

CME's mandate and objectives, its membership and the constituency it represents, and the types of programs and activities by which it carries out its mandate, are described on CME's website, <a href="https://www.cme-mec.ca">www.cme-mec.ca</a>. CME's priority objectives related to Energy and the Environment are summarized in Attachment 1.

# 2. Nature and Scope of CME's Intended Participation

CME has actively participated in the recent proceedings where the issues relevant to this consultation have been considered by the Board [Enbridge Gas Distribution (EB-2012-0459), Ontario Power Generation (EB-2013-0321) and Hydro One Distribution (EB-2013-0416)]. Manufacturers are directly impacted by the costs of electricity and natural gas in the province of Ontario, and as such, are interested in how pension and OPEB costs will be dealt with by the Board in the future.



#### Request for Cost Eligibility 3.

CME intends to seek a cost award in this proceeding on the grounds that its ability to participate is dependent upon a determination that it is eligible for such an award. In many prior proceedings, the Board has determined that CME is eligible for a Cost Award.

#### **BLG's Representation of CME** 4.

Borden Ladner Gervais ("BLG") represents CME under the auspices of a written retainer agreement executed by Ian Howcroft, Vice-President of CME's Ontario Division. BLG's mandate is to represent the interests of manufacturers in those Ontario Energy Board ("OEB") proceedings which are likely to have an impact on the rates which Ontario manufacturers pay for utility services. Paul Clipsham, Director of Policy - Ontario Division of CME, is the individual with whom BLG liaises.

#### 5. **CME Contacts**

If the relief sought 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.

Main Fax: (613) 230-8842

Yours very truly

Vincent J. DeRose

Paul Clipsham and Ian Shaw

OTT01: 7022329: v1

### Attachment 1

## About CME and Its Representation in OEB Proceedings

Canadian Manufacturers & Exporters ("CME") is Canada's leading business network. It represents more than 10,000 leading companies nationwide and through various initiatives, touches more than 100,000 companies from coast-to-coast, engaged in manufacturing, international trade, and service-related industries. More than 85% of its members are Small to Medium sized Enterprises ("SMEs"). In Ontario, CME has about 1,400 members representing about 75% of manufactured output and about 90% of all exports.

One of CME's priorities is to improve the business climate for manufacturers. Initiatives pertaining to Energy and the Environment fall within the scope of this objective and include efforts by CME to ensure that its members enjoy continued access to a reliable and cost competitive supply of energy and electricity across Canada.

In this context, CME seeks an Ontario electricity system for its members which is reliable, affordable, cost effective and economically sustainable with electricity prices for Ontario manufacturers which are competitive with electricity prices available to manufacturers located elsewhere.

Similarly, CME seeks a secure supply of natural gas at burner-tip prices in the plants of Ontario manufacturers which are competitive with such prices for manufacturers located elsewhere.

For further information on CME, please visit their website at www.cme-mec.ca.

CME's authorized representative in proceedings before the Ontario Energy Board (the "Board" or "OEB") is Borden Ladner Gervais LLP ("BLG") represented by Peter C.P. Thompson, Q.C. and Vincent J. DeRose, with support from other BLG associates. BLG's representation of CME in proceedings before the Board is pursuant to a written retainer agreement executed on behalf of CME by Ian Howcroft, Vice-President – Ontario Division of CME.

BLG's mandate is to represent the interests of manufacturers in those OEB proceedings which are likely to have an impact on the rates which Ontario manufacturers pay for utility services. Paul Clipsham, Director of Policy – Ontario Division of CME, is the individual with whom BLG representatives liaise.