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Our File # 339583-000003

By electronic filing

December 17, 2018

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

Dear Ms. Walli

**Re: Enbridge Gas Distribution Inc. (“EGD”) and  
Union Gas Limited (“Union”)  
2019 Rates Application  
Board File #: EB-2018-0305**

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

**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, [www.cme-mec.ca](http://www.cme-mec.ca). CME’s priority objectives related to Energy and the Environment are summarized in Attachment 1.

Natural gas is a significant source of energy for the manufacturing sector. As a result, CME members are vitally concerned with all matters pertaining to the supply and price of natural gas. The outcome of this proceeding will have consequences for ratepayers served by EGD and Union.

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

CME intends to participate actively in this proceeding for the purpose of:

- (a) Assuring that all relevant facts are placed in evidence for the Board's consideration;
- (b) Making submissions on the issues which the Application raises; and
- (c) Such further and other matters as counsel may advise and the Board permits.

**3. Request for Evidence**

CME requests that an electronic copy of the evidence upon which the Application is based be provided to its counsel. CME does not require a hard copy of this material.

**4. Oral or Written Hearing**

An oral hearing, preceded by a written discovery process and a Settlement Conference, is the most efficient way of determining the issues raised by the Application. An oral hearing should be held to determine any issues which cannot be settled.

**5. Request for Cost Eligibility**

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.

**6. BLG's Representation of CME**

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 reliability, quality of service, and/or rates for electricity and natural gas distribution services provided to manufacturers. Alex Greco, Director, Manufacturing Policy, of CME, is the individual with whom BLG liaises.

**7. 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:



