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By electronic filing

November 19, 2021

Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. (“EGI”)  
2022 Rates (Phase 2) Application – Incremental Capital Module  
Board File #: EB-2021-0148**

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 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 EGI.

**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 that the Application raises, such as:
  - (i) Whether or not EGI's incremental capital module requests, including for the St Laurent Ottawa North Replacement (Phase 3) and NPS 20 Replacement Cherry to Bathurst in the EGD rate zone, and the Dawn to Cuthbert Replacement and Retrofits, the Byron Transmission Station and the Kirkland Lake Lateral Replacement Projects in the Union rate zones are material, necessary, prudent, and the cost of which is appropriate to recover from ratepayers;
  - (ii) Whether the proposed allocation of ICM revenue is appropriate; and
  - (iii) The reasonableness and appropriateness of EGI's Asset Management Plan and addendum; 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. Mathew Wilson, Senior Vice President, 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:

Mathew Wilson Senior Vice President Canadian Manufacturers & Exporters 55 Standish Court, Suite 620 Mississauga, ON L5R 4B2  Tel 647.808.8231 Fax 905.672.1764 Email Mathew.Wilson@cme-mec.ca	Borden Ladner Gervais LLP Barristers & Solicitors 100 Queen Street Suite 1300 Ottawa ON K1P 1J9  Main Tel: 613.237.5160 Main Fax: 613.230.8842	Emma Blanchard Tel 613.369.4755 Email eblanchard@blg.com  Scott Pollock Tel 613.787.3541 Email spollock@blg.com
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Please contact the undersigned if the Board requires any further information in connection with these requests.

Yours very truly



Scott Pollock

enclosure

- c. EGI Regulatory Affairs  
David Stevens (EGI Counsel)  
Mathew Wilson (CME)

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## **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 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](http://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 Emma Blanchard and Scott Pollock, 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. Alex Greco, Director, Manufacturing Policy, of CME, is the individual with whom BLG representatives liaise.