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By electronic filing

April 4, 2022

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms. Marconi

**Re: Independent Electricity System Operator  
2022 Expenditure and Revenue Requirement Submission  
Board File #: EB-2022-00002**

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.

Electricity prices and the operation of Ontario’s electricity system are vital inputs into CME’s member’s businesses. As a result, the outcome of this proceeding will have consequences for CME’s members.

**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, including:
  - (i) Whether the IESO's requested orders regarding its 2022 revenue requirement and usage fees are appropriate;
  - (ii) Whether the IESO's proposed revenue requirement for 2022 and capital spending envelope are appropriate;
  - (iii) Whether the IESO's proposed usage fees are appropriate; and
  - (iv) Whether the IESO's proposal to charge a "Reliable Integration Fee" at an hourly rate of \$145/hour is reasonable and appropriate.
- (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**

A written hearing, preceded by a written discovery process and a Settlement Conference, is the most efficient way of determining the issues raised by the Application.

**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. Allison Bernholtz, Manager, Environment & Industrial 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:

Mathew Wilson & Allison Bernholtz SVP, Policy, Government Relations & Ontario Operations Canadian Manufacturers & Exporters 55 Standish Court, Suite 620 Mississauga, ON L5R 4B2  Tel 905.672.3466 Fax 905.672.1764 Email <a href="mailto:Mathew.Wilson@cme-mec.ca">Mathew.Wilson@cme-mec.ca</a> <a href="mailto:Allison.Bernholtz@cme-mec.ca">Allison.Bernholtz@cme-mec.ca</a> <a href="http://mec.ca">mec.ca</a>	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 <a href="mailto:eblanchard@blg.com">eblanchard@blg.com</a>  Scott Pollock Tel 613.787.3541 Email <a href="mailto:spollock@blg.com">spollock@blg.com</a>  Sam Campbell Tel 613.369.4776 Email <a href="mailto:scampbell@blg.com">scampbell@blg.com</a>
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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. Mathew Wilson (CME)
- Allison Bernholtz (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.