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By electronic filing

December 2, 2022

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

Dear Ms. Marconi

**Re: Enbridge Gas Inc. (“EGI”)**  
**EGI 2024 Changes to Natural Gas Rates**  
**Board File #: EB-2022-0200**

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 natural gas prices in the province. The outcome of this proceeding will have consequences for ratepayers served by EGI as outlined in EGI’s application.

**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 EGI has properly calculated its revenue requirement for the 2024 year;
  - (ii) Whether EGI's price cap model IRM proposal is appropriate;
  - (iii) Whether EGI's proposals with respect to deferral and variance accounts is appropriate; and
  - (iv) Whether EGI's proposal regarding altering its equity thickness is appropriate.
- (c) Such further and other matters as counsel may advise and the Board permits.
- (d) CME will be taking no position on EGI's request regarding the Open Bill Program.

**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 is likely 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. Vincent Caron, Director of Policy & Ontario Government Relations, 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:

<p>Vincent Caron Director, Policy &amp; Ontario Government Relations Canadian Manufacturers &amp; Exporters 1400-67 Yonge Street Toronto, ON M5E 1J8</p> <p>Tel 905.672.3466 Fax 905.672.1764 Email Vincent.Caron@cme-mec.ca</p>	<p>Borden Ladner Gervais LLP Barristers &amp; Solicitors 100 Queen Street Suite 1300 Ottawa ON K1P 1J9</p> <p>Main Tel: 613.237.5160 Main Fax: 613.230.8842</p>	<p>Emma Blanchard Tel 613.369.4755 Email eblanchard@blg.com</p> <p>Scott Pollock Tel 613.787.3541 Email <a href="mailto:spollock@blg.com">spollock@blg.com</a></p>

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

Yours very truly



Scott Pollock

Enclosure

c. Vincent Caron (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. Vincent Caron, Director of Policy & Ontario Government Relations, of CME, is the individual with whom BLG liaises.