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By Electronic Filing and By E-mail

October 8, 2008

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th floor
Toronto ON M4P 1E4

Dear Ms Walli,

Westcoast Energy Inc. and Union Gas Limited

Board File No.: EB-2008-0304

Our File No.: 339583-000003

We are writing this letter to request that this application not be disposed of without a hearing and to seek intervenor status and cost award eligibility in this proceeding on behalf of Canadian Manufacturers & Exporters ("CME").

We have had the benefit of reviewing of Mr. Sheppard's letter to the Board dated October 7, 2008. Significant changes to a utility's ownership structure should not be approved without a full understanding of the implications on the regulated utility. In our view, the record necessary for the Board to make this determination could be achieved through written a hearing process.

Request for Intervenor Status

The reasons why CME should be granted intervenor status in this proceeding include the following:

- (i) CME is Canada's leading business network. Its members represent 75% of manufactured output in the Province of Ontario, and 90% of all exports.
- (ii) Manufacturing is important to the Province of Ontario. It is the single largest sector of the economy (17.5% of Gross Domestic Product ("GDP") or \$300B) employing, directly, over 1M people in the Province.
- (iii) Natural gas is significant to manufacturing as one of the sources of energy for the manufacturing sector. As a result, the members of CME, many of whom are served by Union, are vitally concerned with all matters pertaining to the supply and price of natural gas.

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Request for Cost Award Eligibility

CME seeks a determination that it is eligible for a Cost Award on the following grounds:

- (i) 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 and to break down trade barriers.
- (ii) About 85% of CME's 1,200 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.
- (iii) CME's ability to actively participate in this proceeding is dependent upon a determination that it is eligible for a Cost Award. In many prior proceedings, the Board has determined that CME is eligible for a Cost Award.

CME Contacts

If the relief requested in this letter is granted, then CME requests that further communications with respect to this matter be sent to the following:

Paul Clipsham
Director of Policy
Ontario Division
Canadian Manufacturers & Exporters
6725 Airport Road
Suite 200
Mississauga ON L4V 1V2

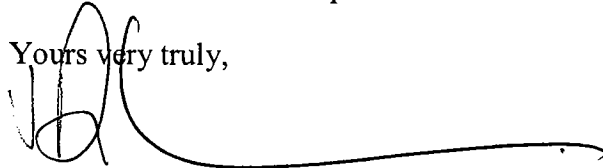
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Please contact the undersigned if the Board requires any further information in connection with these requests.

Yours very truly,


Vincent J. DeRose
VJD/kt

- c. Michael A. Penny (Torys)
Bruce Pydee (Westcoast Energy Inc.)
Mark Kitchen (Union)
Paul Clipsham (CME)