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SENT BY E-FILING & COURIER

Toronto, October 29, 2008

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
PO Box 2319
Toronto, ON, M4P 1E4

Dear Ms. Walli:

RE: EB-2008-0221

We are writing in regard to the late intervention request by the Canadian Manufacturers & Exporters (the "CME") dated October 24, 2008. Bluewater Power requests that the Ontario Energy Board deny the CME's request for intervenor status. Intervenor status has already been granted to three separate intervenors: the SEC; VECC; and AMPCO. These three intervenors regularly participate in distribution rate applications, and together should thoroughly test Bluewater Power's evidence during the course of the proceeding. Further, it is reasonable to assume that these three intervenors represent interests that include all of Bluewater Power's customers. Therefore, in light of these circumstances, we question the value of granting intervenor status to a fourth party in a proceeding involving a mid-sized distributor.

If the Board is contemplating granting the CME intervenor status, we request that the CME be required to disclose the identities of its members located in Bluewater Power's distribution service area. If the interests of those members are already represented, either directly or indirectly, by any of the registered intervenors (i.e. most likely AMPCO), then we submit that granting the CME intervenor status would result in duplicative representation.

Yours very truly,

Ogilvy Renault LLP

Andrew Taylor
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