

By Electronic Filing and By E-mail



October 27, 2008

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

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Dear Ms Walli,

Union Gas Limited
Multi-Year Incentive Rate Mechanism
Board File No.: EB-2008-0292
Our File No.: 339583-000003

We are writing to seek intervenor status and cost award eligibility in this proceeding on behalf of Canadian Manufacturers & Exporters (“CME”).

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 are vitally concerned with all matters pertaining to the supply and price of natural gas commodity, including its transmission and distribution.
- (iv) The outcome of the clarifications and potential variances of the Board’s July 31, 2008 Decision and Order, file EB-2007-0606/0615, which Union asks the Board to consider, will have an impact on those CME member companies who acquire regulated services from Union Gas Limited (“Union”).
- (v) CME has approximately 1,200 Ontario-based member companies which are Small to Medium sized business enterprises (“SMEs”) with 500 employees or less.
- (vi) CME wishes to participate in these proceedings to represent the interests of its members.

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 SMEs. 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:

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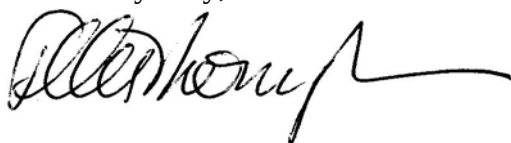
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Please contact the undersigned if the Board requires any further information in connection with these requests.

Yours very truly,



Peter C.P. Thompson, Q.C.

PCT\slc
c. Mark Kitchen (Union Gas Limited)
Richard Battista (OEB)
Michael Millar (OEB)
Paul Clipsham (CME)