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**SENT BY E-FILING & COURIER**

Toronto, November 10, 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 response to the CME's letter dated November 6, 2008. We do not want to belabour the point, but we maintain that VECC, SEC and AMPCO represent the interests of all of Bluewater Power's customers. The CME's members who are small to medium sized business enterprises are members of Bluewater Power's GS>50 and GS<50 rate classes. The schools in Bluewater Power's service are also members of both of those rate classes. Therefore, the SEC will presumably be advocating on behalf of all the members of those rate classes by virtue of representing the interests of schools. If there are rate issues unique to manufacturing, presumably AMPCO will cover them.

Again, we question the value of having a fourth intervenor participate in the rate application of a mid-sized distributor at the ratepayer's expense.

Yours very truly,

**Ogilvy Renault LLP**



Andrew Taylor

AT/rd

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