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ONTARIO ENERGY BOARD

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

Dear Ms Walli,

Bluewater Power Distribution Corporation

Board File No.: EB-2008-0221

Our File No.: 339583-000003

I am writing on behalf of Canadian Manufacturers & Exporters ("CME") in response to a letter from Andrew Taylor dated October 29, 2008.

Bluewater Power has requested that the Board deny CME intervenor status on the basis that VECC, SEC and AMPCO "represent interests that include all of Bluewater Power's customers". CME respectfully disagrees with this assertion.

CME represents the business interests of manufacturers in Ontario. While some large manufacturers might be members of AMPCO, about 85% of CME's 1,200 Ontario based member companies are small to medium sized business enterprises with 500 employees or less ("SME"). CME has reviewed AMPCO's membership list, as set out on the AMPCO website, and has identified only one overlapping member in the Bluewater Power's service area. The interests of CME's broad based membership in the manufacturing sector, in particular the interests of SMEs, are not represented by VECC, SEC or AMPCO. This fact alone should be sufficient for the Board to grant CME intervenor status.

CME's membership database does not identify the geographic location of all of its members' operations. To identify all of CME's members in Bluewater Power's service area would require a significant amount of work by CME. That said, on an initial high-level review CME has identified at least four members in Bluewater Power's service area – of which only one is also a member of AMPCO.

CME's membership list is not publicly available. If the Board wishes to be provided with the identities of CME members that have interests in Bluewater Power's service area, we

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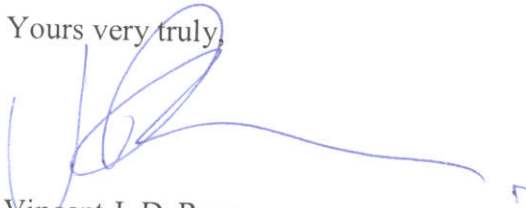
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request that such information be protected by a confidentiality order. Alternatively, CME would need an opportunity to obtain consent from the affected members.

As indicated in our letter requesting intervenor status, CME has, and will continue, to coordinate its efforts with SEC, VECC and AMPCO to avoid any unnecessary duplication. The addition of CME as an intervenor will not significantly increase the costs related to this application. Furthermore, CME's participation will serve the public interest by ensuring that Ontario's manufacturing sector is represented.

For the reasons above, we request that CME be granted intervenor status in this proceeding.

Yours very truly,



Vincent J. DeRose
VJD/kt

- c. Andrew Taylor (Ogilvy Renault)
Daria Babaie (OEB)
Intervenors EB-2008-0221
Paul Clipsham (CME)

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