

CAVALLUZZO HAYES SHILTON  
McINTYRE & CORNISH LLP

BARRISTERS

SOLICITORS

474 Bathurst Street  
Suite 300  
Toronto, Ontario M5T 2S6  
Telephone: 416-964-1115  
Facsimile: 416-964-5895  
Email: [contactus@cavalluzzo.com](mailto:contactus@cavalluzzo.com)  
Website: [www.cavalluzzo.com](http://www.cavalluzzo.com)

**In Association with Patrice F. Band**

**Please refer to:** **Jo-Anne Pickel**  
Direct line: (416) 964-5537  
Email: [jpickel@cavalluzzo.com](mailto:jpickel@cavalluzzo.com)  
Assistant: Fernanda Da Silva  
Assistant's Email: [fdasilva@cavalluzzo.com](mailto:fdasilva@cavalluzzo.com)  
File No.: 080928

July 14, 2010

**VIA MAIL and RESS FILING**

Ms. Kirsten Walli , Board Secretary  
**Ontario Energy Board**  
P.O. Box 2319  
2300 Yonge Street  
Toronto, ON M4P 1E4

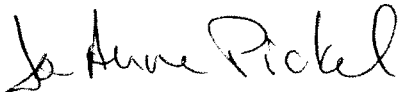
Dear Ms. Walli:

**Re: Society of Energy Professionals' Intervention Request: EB-2010-0008  
Ontario Power Generation – 2011-12 Payment Amounts Application  
for Prescribed Generating Facilities**

We are retained to act as counsel for the Society of Energy Professionals. Please find enclosed a Notice of Motion and Letter of Intervention being filed by the Society of Energy Professionals in the above-noted proceeding.

Yours very truly,

**CAVALLUZZO HAYES SHILTON  
McINTYRE & CORNISH LLP**



Jo-Anne Pickel  
Encls.

cc: Rod Sheppard, The Society of Energy Professionals  
Mike Belmore, The Society of Energy Professionals

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF *the Ontario Energy Board Act, 1998*;**

**AND IN THE MATTER OF an Application Approving Payment Amounts for  
Prescribed Generating Facilities**

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**LETTER OF INTERVENTION  
of  
The Society of Energy Professionals**

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1. The Society of Energy Professionals ("SEP") applies for intervenor status in this proceeding.

**The SEP and Its Interest in the Proceeding**

2. The SEP is a trade union which represents more than 8000 professional employees who work in the Ontario electricity system.
3. The SEP's Ontario Power Generation ("OPG") Local represents 3,750 of the 12,000 OPG employees. The SEP's members work in the following types of positions: civil, mechanical and electrical engineering, project management and, finance analysts, safety officers, supply chain/procurement specialists, information technology, energy trading, and nuclear safety and inspection. Some are also supervisors to both SEP and PWU members.

4. As such, the SEP has an interest in these proceedings and the resulting Board order. The SEP has an interest in ensuring that the interests of OPG employee stakeholders are fully represented in the review of the Application. It also has an interest in protecting the electricity rate payers of Ontario so that they may continue to enjoy a safe, reliable and affordable electricity system.

### **Scope of Intervention**

5. The SEP intends to take part in the Board's technical conferences, interrogatory process, and hearings in respect of this matter. The SEP may also submit evidence in these proceedings.
6. The SEP wishes to receive copies of all evidence filed by the Applicant, intervenors and other interested parties.
7. Although the SEP does not anticipate filing for cost awards, it reserves the right to request cost eligibility for its participation if additional resources become necessary at a later stage in the proceeding.

### **Contact Information for Service and Delivery of Documents**

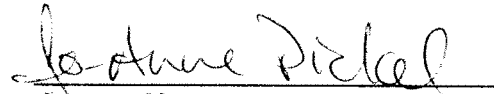
8. The name and address of the persons authorized to receive documents on behalf of the SEP are:

Mike Belmore  
External Relations Officer  
The Society of Energy Professionals  
425 Bloor St. E.  
Toronto, Ontario

M4W 3R4  
Ph: (416) 979-2709 x 3015  
Fax: (416) 979-5794  
[belmorem@thesociety.ca](mailto:belmorem@thesociety.ca)

Jo-Anne Pickel  
Cavalluzzo Hayes Shilton McIntyre & Cornish LLP  
474 Bathurst St., Suite 300  
Toronto, Ontario  
M5T 2S6  
Ph: (416) 964-5537  
Fax: (416) 964-5895  
[jpickel@cavalluzzo.com](mailto:jpickel@cavalluzzo.com)

**ALL OF WHICH IS RESPECTFULLY SUBMITTED this 14th Day of July 2010.**

A handwritten signature in cursive script, reading "Jo-Anne Pickel", written over a horizontal line.

**James Hayes**  
**Jo-Anne Pickel**

**Cavalluzzo Hayes Shilton**  
**McIntyre & Cornish LLP**  
474 Bathurst St., Suite 300  
Toronto, Ontario M5T 2S6

Counsel for the Society of Energy  
Professionals

ONTARIO ENERGY BOARD

IN THE MATTER OF *the Ontario Energy Board Act, 1998*;

AND IN THE MATTER OF an Application Approving Payment Amounts for  
Prescribed Generating Facilities

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NOTICE OF MOTION  
of  
The Society of Energy Professionals

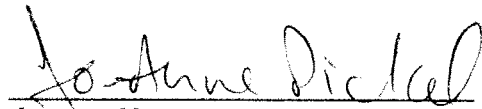
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1. The Society of Energy Professionals ("SEP") makes a motion in writing pursuant to Rule 23.05 of the Board's *Rules of Practice and Procedure* seeking an extension of the time limit for filing the Letter of Intervention enclosed with this Notice of Motion.
2. The grounds of the motion are:
  - (a) The SEP was unable to meet the Board's deadline for filing intervention requests because the Applicant did not serve the SEP with the Notice of Application issued by the Board in respect of this matter as required by the Board's Letter of Direction dated June 4, 2010.
  - (b) The SEP was only informed of the present application late last week. It immediately contacted the Applicant and was advised that the Applicant would not oppose the SEP's intervention in the circumstances.
  - (c) The SEP has acted expeditiously to instruct counsel to file the enclosed intervention request as well as this Notice of Motion.

(d) No party will be prejudiced by the SEP's late intervention request.

3. In light of the foregoing, the SEP requests that the Board grant its motion to extend the time limit to permit it to file its late intervention request in this matter.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED this 14th Day of July 2010**

A handwritten signature in black ink, appearing to read "Jo-Anne Pickel", written over a horizontal line.

**James Hayes**  
**Jo-Anne Pickel**

**Cavalluzzo Hayes Shilton**  
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Counsel for the Society of Energy  
Professionals