

September 24, 2010

**Via Courier and Email (boardsec@oeb.gov.on.ca/)**

Ms. K. Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Application by Toronto Hydro-Electric System Limited for an electricity  
distribution rate change  
Board File: EB-2010-0142 - Intervention of the Canadian Union of Public  
Employees, Local One**

We are counsel for the Canadian Union of Public Employees, Local One, ("CUPE Local One", or, "the Union"). This is the Union's request to the Ontario Energy Board (OEB) for Intervenor status in EB-2010-0142.

**The intervenor**

The Union is a "Trade Union" within the meaning of the *Labour Relations Act, 1995*, and is the sole bargaining agent for approximately 1200 inside and outside employees of Toronto Hydro-Electric System Limited ("THESL").

**The interest of the intervenor and grounds for the intervention**

The Union and its members have unparalleled knowledge in respect of the factual context giving rise to the present Application. Furthermore, as the sole bargaining agent for the above-noted employees, the Union has a substantial interest in the financial health of THESL and, in light of its representative responsibilities, CUPE Local One is committed to participating in regulatory processes that have direct bearing on the safe and efficient distribution and marketing of electricity to consumers in the Greater Toronto Area.

CUPE Local One has been granted intervenor status in prior applications by THESL.



### **Scope of intended participation**

The Union intends to intervene on the issue of the proposal for changes to rates put forward by THESL to the extent that the outcome of the Application may have material implications for CUPE Local One members. The Union intends to participate in this proceeding by, if necessary: submitting information requests; participating in pre-hearing and/or settlement conferences; cross-examining witnesses in any oral hearing that is scheduled; and, making submissions in final argument to the Board.

### **Request on costs**

The Union requests that the Board find it eligible to receive a costs award and intends to seek costs on the basis that its contribution is invaluable both to the proceeding and to the greater public interest, and on the basis that its members' fundamental interests as trade union members employed by the Applicant will be directly impacted by the Board's ultimate decision.

### **The Union's representatives**

We ask that you provide the Union's representatives, listed below, with copies of all materials filed in this proceeding.

Ms. Stephanie Hobbs  
Sack Goldblatt Mitchell LLP  
20 Dundas Street West, Suite 1100  
Toronto ON M5G 2G8

Tel: 416.979.4235  
Fax: 416.591.7333  
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and to: Mr. J. Camilleri  
President, CUPE Local One  
890 Yonge Street, Suite 1001  
Toronto, ON  
M4W 3P4


Tel: 416-968-2549  
Fax: 416-968-6836

The Union requests one hard copy of the pre-filed evidence, to be delivered to counsel. In addition, the Union requests an electronic copy of the pre-filed evidence, as well as any subsequent updates, to be delivered to counsel at the above-noted email address.

The Union requests the Board's direction as to whether this notice of intervention should be served on any other parties.

We look forward to the Board's response. If you have any questions please do not hesitate to contact the undersigned.

Sincerely,



*per.* Stephanie Hobbs  
SH:dm/cope 343

c.c. Mr. Glen Winn, Toronto Hydro-Electric System Limited (*via email*)  
Mr. John Camilleri, CUPE Local 1 (*via fax*)