

February 11, 2008

Ms. Kirsten Walli, Board Secretary
ONTARIO ENERGY BOARD
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Ms. Walli:

Re: EB-2007-0681 - Hydro One Networks Inc. 2007 Distribution Rates Application

We have been retained by the Electrical Contractors Association of Ontario (ECAO) as counsel for ECAO's intended intervention in the captioned proceeding. Please accept this letter as ECAO's request for intervention herein.

Description of the Intervenor.

ECAO is a not-for-profit corporation established to represent electrical contractors across Ontario. ECAO's eight hundred and fifty (850) member contractors provide a broad range of electrical services in the institutional, commercial, industrial, residential and electrical utility construction and maintenance marketplace. The services provided include: the planning, siting, construction and maintenance of power lines, poles and transformers; the construction and maintenance of substations; the construction and maintenance of power generation equipment and facilities (powerhouses and all related inside and interconnection wiring); and the construction and maintenance of interconnection facilities.

ECAO members have a direct and significant interest in the electrical construction and maintenance businesses housed within, or affiliated with, regulated electrical transmission and distribution utilities, and the appropriate regulation of such utilities vis-à-vis such competitive businesses. ECAO members also have a direct interest in the regulation of standards in respect of electrical transmission, distribution and related interconnection facilities.

Impact of the Application on the Intervenor.

In accord with the Board's letter of direction dated May 4, 2007, Hydro One's application herein contemplates a full rebasing of rates, entailing a full review of Hydro One Distribution's costs and revenues. Such review will include consideration of affiliate transactions and non-utility eliminations, as well as consideration of non-distribution revenues forecast by the regulated utility.

ECAO's particular interest in this proceeding is to review the material filed, and to be filed, to assess the appropriateness of the utility/affiliate transactions, non-utility business activities, and non-utility eliminations in light of the legislative and regulatory structure governing the scope of regulated utility business activities and the relationships between utilities and their non-regulated energy services affiliates. Through such review, ECAO will be able to determine any particular concerns or positions that it has with respect to the scope of Hydro One's affiliate relations and non-distribution activities, and to more particularly articulate those concerns prior to subsequent phases of this proceeding.

Intervention Request.

ECAO hereby requests that the Board accept this letter as a request for late intervention. ECAO is prepared to accept the record in this proceeding as it stands as of the date of the Board's determination on this request for intervention.

Costs.

ECAO intends to seek costs from the applicant in this proceeding.

ECAO does not primarily represent the direct interests of consumers in relation to regulated services or a public interest entity per se. ECAO represents the interests of the electrical contracting industry at large in a robustly competitive energy services marketplace, and in a properly competitive electrical contracting marketplace in particular. ECAO's members constitute a distinct stakeholder group with a direct interest in the cost of service and competitive implications of utility and/or utility affiliate expenditures, revenues and activities.

Proper competition in contestable areas of the sector leads to efficient investment, electrical services costs that are lower than they otherwise would be, and high standards of electrical contracting services and thus a reliable electricity system. These outcomes - investment efficiency, downward pressures on costs and high standards and resulting reliability - are in the public interest.

There are no other parties appearing before the Board that provide the insight or understanding in respect of utility activities impacting on the electrical contracting business. It is submitted that it is in the public interest that ECAO be represented in this proceeding and others like it, and that ECAO be able to provide the Board with the perspectives and insights that its constituency and

mandate brings. ECAO submits that eligibility for cost recovery for responsible participation in this proceeding will facilitate the Board's consideration of these public interest issues in this and other proceedings.

Communications.

ECAO requests that all communications and materials in this proceeding be directed to:

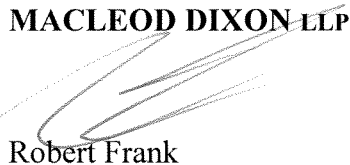
MACLEOD DIXON LLP

Toronto Dominion Centre
Canadian Pacific Tower
100 Wellington Street West, Suite 500
P.O. Box 128
Toronto ON M5K 1H1
Attention: Robert Frank
Andrew MacSkimming
Nicole Bryant

Phone: 416 360 8511
Fax: 416 360 8277
e-mail: robert.frank@macleoddixon.com
andrew.macskimming@macleoddixon.com
nicole.bryant@macleoddixon.com

Yours truly,

MACLEOD DIXON LLP



Robert Frank

cc: Eryl Roberts (by e-mail)
Glen MacDonald (by e-mail)
Don Rogers, Q.C. (by e-mail)