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File 10329

December 20, 2011

VIA RESS FILING

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

Dear Ms. Walli

Re: Phase 2 – Initiative to Develop Electricity Distribution System Reliability Standards (EB-2010-0249)

The Power Workers' Union ("PWU") represents a large portion of the employees working in Ontario's electricity industry. Attached please find a list of PWU employers.

The PWU is committed to participating in regulatory consultations and proceedings to contribute to the development of regulatory direction and policy that ensures ongoing service quality, reliability and safety at a reasonable price for Ontario customers. To this end, please find the PWU's comments on issues covered in the Board's letter of November 23, 2011 on Phase 2- Initiative to Develop Electricity Distribution System Reliability Standards.

The PWU is interested in being part of the Reliability Data Working Group. The PWU was a member of the Board's 1st Generation PBR Implementation Task Force that developed the Board's existing service reliability guidelines as well as a member of the Board's 2003 Customer Service Quality Regulation Working Group (RP-2003-0190). The PWU would bring this experience to the Working Group's discussions.

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Jodi Martin Michael Fenrick

Susan Brown

Nasha Nijhawan Jessica Latimer

Debra Newell

Lindsay Scott

Alysha Shore

HONORARY COUNSEL lan G. Scott, Q.C., O.C. (1934 - 2006) We hope you will find the PWU's comments useful.

Yours very truly,
PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

Original signed by

Richard P. Stephenson

Encl.

cc: John Sprackett

Judy Kwik

List of PWU Employers

Algoma Power

AMEC Nuclear Safety Solutions

Atomic Energy of Canada Limited (Chalk River Laboratories)

BPC District Energy Investments Limited Partnership

Brant County Power Incorporated

Brighton Beach Power Limited

Brookfield Power - Mississagi Power Trust

Bruce Power Inc.

Capital Power Corporation Calstock Power Plant

Capital Power Corporation Kapuskasing Power Plant

Capital Power Corporation Nipigon Power Plant

Capital Power Corporation Tunis Power Plant

Coor Nuclear Services

Corporation of the City of Dryden - Dryden Municipal Telephone

Corporation of the County of Brant, The

Coulter Water Meter Service Inc.

CRU Solutions Inc.

Ecaliber (Canada)

Electrical Safety Authority

Erie Thames Services and Powerlines

ES Fox

Great Lakes Power Limited

Grimsby Power Incorporated

Halton Hills Hydro Inc.

Hydro One Inc.

Independent Electricity System Operator

Inergi LP

Innisfil Hydro Distribution Systems Limited

Kenora Hydro Electric Corporation Ltd.

Kincardine Cable TV Ltd.

Kinectrics Inc.

Kitchener-Wilmot Hydro Inc.

Lake Superior Power Inc. (A Brookfield Company)

London Hydro Corporation

Middlesex Power Distribution Corporation

Milton Hydro Distribution Inc.

New Horizon System Solutions

Newmarket Hydro Ltd.

Norfolk Power Distribution Inc.

Nuclear Waste Management Organization

Ontario Power Generation Inc.

Orangeville Hydro Limited

Portlands Energy Centre

PowerStream

PUC Services

Sioux Lookout Hydro Inc.

Sodexho Canada Ltd.

TransAlta Generation Partnership O.H.S.C.

Vertex Customer Management (Canada) Limited

Whitby Hydro Energy Services Corporation