

March 28, 2012

**VIA COURIER AND RESS FILING**

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

Dear Ms. Walli

**Re: Ontario Power Generation 2013-2014 Payment Amounts (EB-2012-0002) –  
Niagara Tunnel Project Prudence Review**

The PWU represents a large portion of the employees working in Ontario's electricity industry and has utmost interest in regulatory proceedings that impact the provision of electricity service adequacy, reliability and safety to customers. Attached please find a list of PWU employers.

The Ontario Energy Board (the "Board" or "OEB") issued a letter on March 26, 2012 inviting comments on a March 12, 2012 Ontario Power Generation ("OPG") proposal to file a separate application in 2013 for the review of the reasonableness of the costs associated with the Niagara Tunnel Project ("NTP").

The PWU supports OPG's proposal for an OEB prudence review of the NTP in 2013 for the reasons provided in OPG's letter of March 12, 2012 including:

- Focus of the review on the NTP evidence given the size and complexity of the project;
- Number of other substantial issues to be addressed in the 2013-2014 payment amount proceeding other than the NTP;
- Enhanced overall accuracy of NTP costs and schedule forecast that will be available in 2013 compared to 2012; and
- No ratepayer impact from the proposal.

HONORARY COUNSEL  
Ian G. Scott, Q.C., O.C.  
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OPG's proposal to exclude the NTP costs from the revenue requirement that forms the basis of the 2013-2014 Payments Amount Application and to recover the NTP costs approved by the Board via a rate rider that would come into effect in 2014 following the December 31, 2013 anticipated NTP in-service date.

We hope you will find the PWU's comments useful.

Yours very truly,

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP



Richard P. Stephenson

RPS:jr

encl.

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Algoma Power  
 AMEC Nuclear Safety Solutions  
 Atlantic Power Calstock Power Plant  
 Atlantic Power Corporation Kapuskasing Power Plant  
 Atlantic Power Corporation Nipigon Power Plant  
 Atlantic Power Corporation Tunis Power Plant  
 Atomic Energy of Canada Limited (Chalk River Laboratories)  
 BPC District Energy Investments Limited Partnership  
 Brant County Power Incorporated  
 Brighton Beach Power  
 Brookfield Renewable Power . Mississagi Power Trust  
 Bruce Power Inc.  
 Compass Group Canada  
 Coor Nuclear Services  
 Corporation of the City of Dryden . Dryden Municipal Telephone  
 Corporation of the County of Brant, The  
 Electrical Safety Authority  
 Erie Thames Powerlines  
 EARTH Holdings Inc.  
 ES Fox  
 Great Lakes Power Transmission  
 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.  
 Kinectrics Inc.  
 Kitchener-Wilmot Hydro Inc.  
 Lake Superior Power LTD Partnership . A Brookfield Company  
 London Hydro Corporation  
 Middlesex Power Distribution Corporation  
 Milton Hydro Distribution Inc.  
 New Horizon System Solutions  
 Newmarket-Tay Power Distribution Ltd.  
 Norfolk Power Distribution Inc.  
 Nuclear Waste Management Organization  
 Ontario Power Generation Inc.  
 Orangeville Hydro Limited  
 Portlands Energy Centre  
 PowerStream  
 PUC Services  
 Rogers Communications (Kincardine Cable TV)  
 Sioux Lookout Hydro Inc.  
 TransAlta Generation Partnership O.H.S.C.  
 Vertex Customer Management (Canada) Limited  
 Whitby Hydro Energy Services Corporation