

July 31, 2012

VIA COURIER AND 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: Proposed Amendments to the Distribution System Code (EB-2012-0301)

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 policy and structure that ensures ongoing service quality, reliability and safety at a reasonable price for Ontario customers. To this end, the PWU provides the following comments on proposed amendments to the Distribution System Code ("DSC").

On July 27, 2012 the Board issued a Notice of Proposal for amendments to the DSC to "provide additional time for applicants of large embedded generation facilities that require transmission upgrades to sign a connection cost agreement with the distributor for the facility and maintain its capacity allocation." The proposed amendments increase the time requirement for the signing of connection cost agreements from six to nine months without removal of the applicant's capacity allocation, where the connection of the proposed large embedded generation facility requires transmission upgrades.

The PWU supports amendments to section 6.2.4.1(e)(i) and section 6.2.4.1(g) of the DSC as proposed. Given the Board's finding in EB-2010-0229 that nine months was the appropriate timeline for connection cost agreements when both distribution and transmission upgrades were required, the proposed amendments are necessary and consistent with the Board's finding.

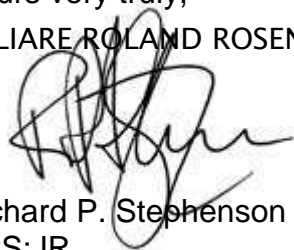
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HONORARY COUNSEL
Ian G. Scott, Q.C., O.C.
(1934 - 2006)

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

Yours very truly,

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

A handwritten signature in black ink, appearing to read 'Richard P. Stephenson', is written over the firm name.

Richard P. Stephenson

RPS:JR

encl.

cc: John Sprackett

Judy Kwik

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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.
Atlantic Power - Calstock Power Plant
Atlantic Power - Kapuskasing Power Plant
Atlantic Power - Nipigon Power Plant
Atlantic Power - Tunis Power Plant
Coo 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)
Entegrus Powerlines Inc.
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
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.
Sodexo Canada Ltd.
TransAlta Generation Partnership O.H.S.C.
Vertex Customer Management (Canada) Limited
Whitby Hydro Energy Services Corporation