

January 9, 2013

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VIA COURIER

Ms Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto ON M4P 1E4

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ONTARIO ENERGY BD

Dear Ms Walli:

**Re: Horizon Utilities Corporation – Service Area Amendment Application
Request for Intervenor Status
Board File No. EB-2012-0047
Our File No. 130068**

We are counsel to the International Brotherhood of Electrical Workers, Local 636 (the "IBEW" or "Local 636") and have been retained with respect to this matter.

The IBEW hereby requests Intervenor status in the above-noted proceeding. This proceeding came to the attention of the IBEW only yesterday. To the extent that this is a late intervention request, the IBEW seeks the Board's leave to do so.

The IBEW represents almost 300 employees of Horizon Utilities Corporation, i.e. a majority of Horizon's employees, including employees who would be directly involved in work in the service territory that is the subject of the application. As a result, IBEW members will be directly affected by the application and its outcome. If the application is unsuccessful, current and future work opportunities for employees represented by the IBEW will be compromised or disappear.

More generally, the IBEW represents a large portion of the employees working in Ontario's electricity industry, including almost 3300 men and women working for numerous LDCs, including the following employers: Bluewater Power, Brantford Power, Burlington Hydro, Cambridge Hydro, Canadian Niagara Power, Centre Wellington Hydro, Collus Power, Eastern Ontario Power, Elk Energy, Enersource Hydro, Entegrus, Enwin Utilities, Festival Hydro, Guelph Hydro, Horizon Utilities, Hydro One Brampton, Hydro Ottawa, Kingston Utilities, Kitchener-Wilmot Hydro, Midland Power, Oakville Hydro, Orillia Power Distribution, Oshawa PUC, Peterborough Utilities, Waterloo North Hydro, Welland Hydro, Woodstock Hydro and several more.

It follows that the IBEW is interested in any regulatory proceeding that will affect the provision of electricity service adequacy, reliability and safety to consumers.

We have recently been made aware of the fact that the Power Workers' Union ("PWU"), a trade union with a similar (although a competing) interest has been granted intervenor status in this proceeding. It would be unfortunate -- not to mention unfair -- if the Board was prepared to hear from only one side of the relevant affected workforce stakeholders (but not the other).

The IBEW intends to argue that Horizon's application should be allowed on the basis of the evidence, the regulatory framework, the Board's policies and Codes and the relevant Board jurisprudence. However, like the PWU, the IBEW's intervention will not lead to any delay or lengthening of the proceeding. The IBEW will not adduce any of its own evidence in the proceeding. The IBEW's involvement will be limited to submitting interrogatories, undertaking examination of witnesses and making submissions. The IBEW understands and fully accepts its obligation to participate "responsibly" in the proceeding

We request that copies of all communications with regard to the IBEW's participation in this proceeding be provided to:

- (i) Barry Brown
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and

- (ii) Ron Lebi
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Finally, we confirm that the IBEW will not be seeking an award of costs.

Yours truly,

KOSKIE MINSKY LLP



Ron Lebi

- c. Applicant and Intervenors (*via email*)
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