

January 31, 2013

Richard P. Stephenson

T 416.646.4325 Asst 416.646.7417

F 416.646.4301

E richard.stephenson@paliareroland.com www.paliareroland.com

File 21549

## VIA COURIER and RESS FILING

Ms. Kirsten Walli **Board Secretary** Ontario Energy Board 2300 Yonge Street 27<sup>th</sup> Floor

Dear Ms. Walli:

Toronto ON M4P 1E4

Re: **Notice of Application and Oral Hearing** Application To Review Market Rule Amendments Renewable Energy **Supply Generators Board File No. EB-2013-0029** 

We are retained to act as counsel to Power Workers' Union.

By way of this letter, the Power Workers' Union ("PWU") is requesting Intervenor status in the Board's above-noted proceedings.

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.

A PWU representative was an active participant in the IESO's SE-91 stakeholdering process. In addition, the PWU filed written submissions to the IESO regarding the then proposed amendments to the rules in question. As such the PWU has a substantial interest in the current application.

The PWU has retained Judy Kwik of Elenchus Research Associates as consultants and Paliare Roland for legal representation in this proceeding. Please provide copies of all communications with regard to the PWU's participation to:

> John Sprackett Staff Officer. President's Office Power Workers' Union 244 Eglinton Avenue East.

Chris G. Paliare Ian J. Roland

Ken Rosenberg Linda R. Rothstein Richard P. Stephenson

Nick Coleman

Margaret L. Waddell Donald K. Eady

Gordon D. Capern

Lily I. Harmer Andrew Lokan

John Monger Odette Soriano

Andrew C. Lewis

Megan E. Shortreed Massimo Starnino

Karen Jones

Robert A. Centa

Nini Jones Jeffrey Larry

Kristian Borg-Olivier **Emily Lawrence** 

Denise Sayer

Danny Kastner

Tina H. Lie Jean-Claude Killey

Jodi Martin

Michael Fenrick

Nasha Nijhawan

Jessica Latimer

Debra Newell Lindsay Scott

Alysha Shore

Gregory Ko

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

Toronto, ON M4P 1K2 e-mail: spracket@pwu.ca Telephone: (416) 322-4787

Fax: 416-481-7914

And,

Judy Kwik

Senior Consultant

Elenchus Research Associates (ERA)

34 King Street East, Suite 610 Toronto, Ontario M5C 2X8 e-mail: <a href="mailto:jkwik@Elenchus.ca">jkwik@Elenchus.ca</a> Telephone: 416-348-8777

Fax: 416-348-9930

And,

Richard Stephenson

Counsel

Paliare Roland

250 University Avenue, Suite 510

Toronto, Ontario M5H 3E5

e-mail: Richard.Stephenson@paliareroland.com

Telephone: 416-646-4325

Fax: 416-646-4335

The PWU will not be seeking cost eligibility in these proceedings.

Yours very truly,

PALIARE/ROMAND ROSENBERG ROTHSTEIN LLP

Richard P. Stephenson

RPS:jr encl.

cc: Mr. George Vegh, McCarthy Tetrault LLP

Counsel for the Applicants

Judy Kwik, ERA

John Sprackett, PWU

Doc 854782v1

## **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

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)

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