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Our File No. 14-567

September 11, 2014

Via Courier and Email (boardsec@oeb.gov.on.ca)

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

Dear Ms. Walli:

**Re: Application by Toronto Hydro-Electric System Limited for an electricity
distribution rate change
Board File: EB-2014-0116 - Notice of Intervention of the Canadian Union of Public
Employees, Local One**

We are counsel for the Canadian Union of Public Employees, Local One ("CUPE", or, the "Union"). This is the Union's request to the Ontario Energy Board ("OEB") for Intervenor status in EB-2014-0116.

The Intervenor

The Union is a "Trade Union" within the meaning of the *Labour Relations Act, 1995*, and is the sole bargaining agent for approximately 950 inside and outside employees of Toronto Hydro-Electric System Limited ("THESL").

The interest of the Intervenor and grounds for the intervention

The Union and its members have specialist knowledge in respect of the factual context giving rise to the present Application. Furthermore, as the sole bargaining agent for the above-noted employees, the Union has a substantial interest in the financial affairs of THESL and, in light of its public role in the community and its representative responsibilities to its membership, CUPE is committed to participating in regulatory processes that have direct bearing on the safe and efficient distribution and marketing of electricity to consumers in the Greater Toronto Area.

CUPE has been granted intervenor status in prior applications by THESL.



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Scope of intended participation

The Union intends to intervene on the issue of the proposal for changes to rates put forward by THESL to the extent that the outcome of the Application may have material implications for the Union's members. The Union intends to participate in this proceeding by, if necessary: submitting information requests; participating in pre-hearing and/or settlement conferences; cross-examining witnesses in any oral hearing that is scheduled; and, making submissions in final argument to the Board.

Request on costs

The Union requests that the Board find it eligible to receive a costs award and intends to seek costs on the basis that its contribution is invaluable both to the proceeding and to the greater public interest, and on the basis that its members' fundamental interests as trade union members employed by the Applicant will be directly impacted by the Board's ultimate decision.

The Union's representatives

We ask that you provide the Union's representatives, listed below, with copies of all materials filed in this proceeding.

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and to: Mr. J. Camilleri
President, CUPE Local One
890 Yonge Street, Suite 1001
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Tel: 416-968-2549, ext. 25
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The Union requests one hard copy of the pre-filed evidence to be delivered to counsel. In addition, the Union requests an electronic copy of the pre-filed evidence, as well as any subsequent updates, to be delivered to counsel at the above-noted email address.

The Union requests the Board's direction as to whether this notice of intervention should be served on any other parties.

We look forward to the Board's response. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



Stephanie Hobbs

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c.c. Mr. John Camilleri, CUPE Local 1
Mr. Rob Barrass, THESL Regulatory Affairs

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