

Chris G. Paliare lan 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 Tina H. Lie Jean-Claude Killey Jodi Martin Michael Fenrick Jessica Latimer Debra McKenna Lindsay Scott Alvsha Shore Denise Cooney Zoë Paliare

# Jesse Elders

### COUNSEL

Stephen Goudge, Q.C. Robin D. Walker, Q.C.

HONORARY COUNSEL

lan G. Scott, Q.C., O.C. (1934 - 2006)

May 26, 2016

## 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: Enersource Hydro Mississauga Inc., Horizon Utilities Corporation, and PowerStream Inc. have applied for approval to amalgamate to form LDC Co. and for LDC Co. to purchase and amalgamate with Hydro One Brampton Networks Inc. and continue as LDC Co. (EB-2016-0025)

We are retained to act as counsel to Power Workers' Union ("PWU").

By way of this letter, the PWU is indicating its interest in participating in Enersource Hydro Mississauga Inc., Horizon Utilities Corporation, and PowerStream Inc.'s application for approval to amalgamate to form LDC Co. and for LDC Co. to purchase and amalgamate with Hydro One Brampton Networks Inc. and continue as LDC Co. (EB-2016-0025).

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

The PWU will not be requesting cost eligibility for its participation in the consultation.

The PWU appoints and authorizes Richard Stephenson of Paliare Roland for legal representation, Bayu Kidane and Kim McKenzie of Elenchus Research Associates as consultants to represent and act on behalf of the PWU in this proceeding. Please provide copies of all communications and delivery of documents with regard to the PWU's participation to:

John Sprackett Staff Officer, President's Office Power Workers' Union 244 Eglinton Avenue East Toronto, ON M4P 1K2 e-mail: jsprackett@pwu.ca Telephone: (416) 322-4787 Fax: 416-481-7914

#### **Richard P. Stephenson**

- 416.646.4325 Asst 416.646.7419 F
- 416.646.4301
- E richard.stephenson@paliareroland.com www.paliareroland.com

File 92714

And,

Richard Stephenson Counsel Paliare Roland 155 Wellington Street West, 35th Floor Toronto, Ontario M5V 3H1 e-mail: Richard.Stephenson@paliareroland.com Telephone: 416-646-4325 Fax: 416-646-4335

And,

Bayu Kidane Senior Consultant Elenchus Research Associates 34 King Street East, Suite 600 Toronto, Ontario M5C 2X8 e-mail: <u>bkidane@elenchus.ca</u> Telephone: 416-348-8777 Fax: 416-348-9930

And,

Kim McKenzie Consultant Elenchus Research Associates 34 King Street East, Suite 600 Toronto, Ontario M5C 2X8 e-mail: <u>kmckenzie@elenchus.ca</u> Telephone: 416-640-1894 Fax: 416-348-9930

Yours very truly, PALKARE ROLAND ROSENBERG ROTHSTEIN LLP Richard P Stephenson RPS:pb

Encl.

Doc 1832193 v1

## List of PWU Employers

Algoma Power AMEC Nuclear Safety Solutions Atlantic Power Corporation - Calstock Power Plant Atlantic Power Corporation - Kapuskasing Power Plant Atlantic Power Corporation - Nipigon Power Plant BPC District Energy Investments Limited Partnership Brant County Power Incorporated **Brighton Beach Power Limited Brookfield Power Wind Operations** Brookfield Renewable Power - Mississagi Power Trust Bruce Power Inc. Canadian Nuclear Laboratories (AECL Chalk River) Compass Group Corporation of the County of Brant Covanta Durham York Renewable Energy Ltd. Entearus **Erie Thames Powerlines** Erth Corporation Great Lakes Power (Generation) Great Lakes Power Transmission Grimsby Power Incorporated Halton Hills Hydro Inc. Hydro One Inc. Independent Electricity System Operator Inergi LP InnPower (Innisfil Hydro Distribution Systems Limited) Kenora Hydro Electric Corporation 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 Nuvia Canada Ontario Power Generation Inc. Orangeville Hydro Limited Portlands Energy Centre PowerStream **PUC Services** Rogers Communications (Kincardine Cable TV Ltd.) Sioux Lookout Hydro Inc. SouthWestern Energy The Electrical Safety Authority TransAlta Generation Partnership O.H.S.C. Westario Power Whitby Hydro Energy Services Corporation