

July 25, 2016

VIA EMAIL & COURIER
Boardsec@Ontarioenergyboard.ca.

Ms. Kirstin Walli
Board Secretary
Ontario Energy Board (the "Board")
2300 Yonge Street
P.O. Box 2319, Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: EB-2016-0152 – Application by Ontario Power Generation Inc. ("OPG") for 2017-2021 Payment Amounts (the "Application")

We are legal counsel to SNC-Lavalin Nuclear Inc. and to Aecon Construction Group Inc. (together, the "SNC/Aecon JV"), who are parties to three contracts (the "DRP Contracts") with OPG related to the refurbishment of the Darlington Nuclear Generating Station ("DNGS"), that are in evidence in this Application.

We write on behalf of the SNC/Aecon JV to request leave to intervene and participate in the Application. The sole issue in which the SNC/Aecon JV has an interest concerns certain claims for confidentiality of portions of the DRP Contracts, and the DRP Contract Summaries filed by OPG as set out in OPG's Letter Requesting Confidentiality filed May 27, 2016, and any related evidence to be filed herein (the "SNC/Aecon JV Confidential Information"). The SNC/Aecon JV seeks status as an intervenor in the Application, limited to participation in proceedings that relate to or affect the confidentiality of the SNC/Aecon JV Confidential Information.

The three DRP Contracts between our clients and OPG are:

1. the Engineering, Procurement and Construction Agreement for the Darlington Refurbishment Retube and Feeder Replacement Project dated March 1, 2012 as amended (the "RFR Agreement");
2. the Engineering, Procurement and Construction Agreement for the Turbine Generator Refurbishment Project dated January 22, 2014 as amended (the "TG Agreement"); and

3. the Extended Services Master Services Agreement dated December 19, 2014 (the “ES MSA”).

By this intervention, the SNC/Aecon JV seeks to protect the confidentiality of the SNC/Aecon JV Confidential Information to the fullest extent possible, consistent with the Board’s *Rules of Practice and Procedure* and the Board’s *Practice Direction on Confidential Filings* (the “*Practice Direction*”).

The SNC/Aecon JV undertakes to abide by all scheduling and procedural Orders that this Board may make with respect to this proceeding, and to not seek costs as against OPG.

The contacts for the SNC/Aecon JV for purposes of service and otherwise in this proceeding are:

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Yours very truly,

A handwritten signature in black ink, appearing to read "M. Philip Tunley". The signature is fluid and cursive, with a prominent "M" and "P" at the beginning and a long, sweeping tail.

M. Philip Tunley
MPT/sjb