

April 17, 2018

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*Via Courier*

Ontario Energy Board  
2300 Yonge Street  
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Toronto, ON M4P 1E4

RECEIVED

APR 18 2018

ONTARIO ENERGY BOARD

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Alectra Utilities Corporation and Guelph Hydro Electric Systems Inc. –  
Request for Intervenor Status  
OEB File No. EB-2018-0014**

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

The IBEW hereby requests Intervenor status in the above-noted proceeding in accordance with Rule 22 of the Rules of Practice and Procedure and the OEB's Notice of Hearing.

The IBEW represents approximately 82 employees of Guelph Hydro Electric Systems Inc. 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 and their current and future work opportunities will be directly affected by the application and its outcome. The Collective Agreement in place between the IBEW Local 636 and Guelph Hydro Electric Systems Inc. is set to expire March 31, 2021.

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

The IBEW requests the Board exercise its discretion under Rule 32 of the Rules of Practice and Procedure to hold an oral hearing into this matter. An oral hearing is appropriate in these circumstances given the complexity of the matter and the number of persons affected. An oral hearing will allow affected parties to adequately participate.

The IBEW's intervention will not lead to any significant delay. The IBEW does not intend to adduce any of its own evidence in the proceeding. The IBEW understands and fully accepts its obligation to participate responsibly in the proceeding. We confirm that the IBEW will not be requesting eligibility for costs in this proceeding.

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

- (i) **IBEW Local 636**  
7170 West Credit Avenue, Unit 2B  
Mississauga, ON L5N 6C6  
Telephone: 905 286 0330 Fax: 905 286 0042  
Attention: Mr. Barry Brown, Business Manager  
Email: barry053@sympatico.ca  
Attention: Mr. Brian Manninger, Business Representative  
Email: brianlocal636@gmail.com

And to

- (ii) **Koskie Minsky LLP**  
900- 20 Queen Street West  
Toronto, ON M5H 3R3  
Telephone: 416 595 2142 Fax: 416 204 2893  
Attention: Mr. Ernie Schirru  
Email: eschirru@kmlaw.ca  
Attention: Ms. Lauren Tarasuk  
Email: ltarasuk@kmlaw.ca

Yours truly,

**KOSKIE MINSKY LLP**



Ernie A. Schirru  
EAS:lm

- c IBEW Local 636  
Attention: Messrs. Barry Brown & Brian Manninger

Alectra Utilities Corporation and Guelph Hydro Electric Systems Inc.  
c/o Torys LLP  
Attention: Mr. Charles Keizer