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File No.: 20741

May 11, 2018

## VIA COURIER and RESS FILING

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

Dear Ms. Walli.

Alectra Utilities Corporation and Guelph Hydro Electric Systems Inc. Re: MAAD Application (EB-2018-0014) PWU Request for Late Intervention

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

By way of this letter, the Power Workers' Union ("PWU") is requesting late Intervenor status in the Board's proceedings with respect to the above-noted application. The Power Workers' Union were intervenors in the Alectra MAADs case (Board File No.: EB-2016-0025).

This application only very recently came to our attention, and we promptly obtained instructions to request intervention. We appreciate that the application is late, however, we do not believe this intervention will cause any delay to the processing or determination of the application. The PWU will not be seeking to adduce any evidence and will abide by all Board imposed deadlines.

The PWU represents a large portion of the employees working in Ontario's electricity industry (including the employees of the Applicant, Alectra) 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.

The PWU intends to be a full-time intervenor and will participate in all aspects of the hearing. The PWU supports the proposed transaction and is of the view that it is in the interest of all affected ratepayers and is consistent with the Board's objectives.

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

Paul Reece, Chief of Staff Power Workers' Union 244 Eglinton Avenue East. Toronto, ON M4P 1K2 e-mail: preece@pwu.ca Telephone: 416-322-2439

Fax: 416-481-7115

And,

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And,

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

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And,

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

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In addition to electronic copies of evidence and communications, please provide one hard copy of the Application and any other supporting materials to Kim McKenzie, and one hard copy to counsel, Richard Stephenson.

The Power Workers' Union will not be seeking costs in respect of this proceeding.

Yours very truly,

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

Richard P. Stephenson RPS:km

cc. Alectra Utilities Corporation and Guelph Hydro Electric Systems Inc.

c/o Torys LLP Attn. C. Keizer

## **List of PWU Employers**

Alectra Utilities

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 Wind Operations** 

Brookfield Renewable Power - Mississagi Power Trust

Bruce Power Inc.

Atlantic Power Corporation - Calstock Power Plant

Atlantic Power Corporation - Kapuskasing Power Plant

Atlantic Power Corporation - Nipigon Power Plant

Atlantic Power Corporation - Tunis Power Plant

Compass Group Corporation of the County of Brant

The Electrical Safety Authority

Entegrus

**Erie Thames Powerlines** 

**Erth Corporation** 

ES Fox

**Great Lakes Power** 

**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.

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 Hvdro 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
TransAlta Generation Partnership O.H.S.C.
Vertex Customer Management (Canada) Limited
Whitby Hydro Energy Services Corporation