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June 20, 2018

File No.: 94355

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,

Re: Application by Hydro One Networks Inc. and Orillia Power Distribution Corporation pursuant to s. Rule 8 and Rules 40 through 42 of the OEB *Rules of Practice and Procedure* for an Order or Orders to vary the OEB's EB-2016-0276 Decision and Order dated April 12, 2018 (EB-2018-0171)

We are retained to act as counsel to Power Workers' Union. We have reviewed Procedural Order #1, issued by the Board on June 18, 2018.

By way of this letter, the Power Workers' Union ("PWU") is requesting Intervenor status in the Board's proceedings with respect to the above-noted application.

As the Board is aware, the PWU represents a large portion of the employees working in Ontario's electricity industry (including the employees of the Hydro One). Attached please find a list of PWU employers.

PWU members will be affected by the Board's decision because, in the event the application was approved, employees of Orillia Power may fall under the PWU's representation.

The PWU did not intervene in EB-2016-0276 because, on the PWU's understanding of the Board's established jurisprudence, the application did not appear to be a controversial one, the PWU had little to add to the proceeding. However, as Hydro One's motion to review outlines, in the EB-2016-0276 decision the Board has, without prior notice, introduced a new and different approach to dealing with MAAD applications. If the PWU had been aware of the possibility that the Board would adopt this approach, it would have sought to intervene in EB-2016-0276, for the purpose of arguing in favour of the Board's existing test and approach.

It is the view of the PWU that the Board's decision in EB-2016-0276 is flawed, and will have a serious and prejudicial effect on future merger and amalgamation applications. This this is a proper case for the Board to exercise its powers to review and vary.

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:

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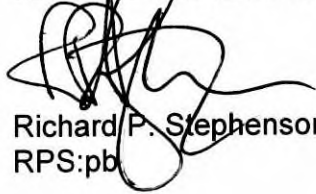
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The Power Workers' Union will not be seeking costs in respect of this proceeding.

Yours very truly,

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

A handwritten signature in black ink, appearing to be 'R. Stephenson', written over the firm name.

Richard P. Stephenson
RPS:pb

Encl.

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

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