

KOSKIE MINSKY

July 24, 2018

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Via Courier

Ontario Energy Board
2300 Yonge Street
26th Floor, Box 2319
Toronto, ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

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

As you are aware, we are counsel to the International Brotherhood of Electrical Workers, Local 636 (the "IBEW") in the above referenced matter. Further to the reply submissions submitted by Alectra Utilities Corporation ("Alectra"), the IBEW is responding to the offer contained in Alectra's July 20, 2018 letter.

The IBEW does not consent to the "compromise" proposed by Alectra. In their July 20, 2018 submissions Alectra offered to provide the portions of the interrogatory responses it is claiming are confidential if IBEW counsel file a Declaration and Undertaking and such individuals who view the material are at arm's length from the IBEW and will not be involved in any collective bargaining. The entire premise of this offer is untenable as counsel would be placed in a position where they would not be able to provide full information to their client or seek instructions. Such a proposal is frankly inflammatory and a proposal Alectra must be aware the IBEW cannot agree to.

The IBEW requests that the Board decide the confidentiality matter between the parties on the basis of submissions. In accordance with the Board's Practice and Direction on Confidential Filings the IBEW maintains its position that the information is not confidential and is necessary to fully participate in the process and present the Union's case. The IBEW relies on the submissions made in its July 17, 2018 correspondence. Alectra has not raised any bone fide harm or concern that warrants the strict limits it is seeking.

Yours truly,

KOSKIE MINSKY LLP



Ernie A. Schirru
EAS:lm

- c. IBEW Local 636
Attention: Mr. Brian Manninger, Business Manager

- Ontario Energy Board
Attention: Ms. Saleh Lavaee, Case Manager & Mr. Ian Richler, OEB Counsel

- Alectra Utilities Corporation
Attention: Ms. Indy Butany-DeSouza

- Guelph Hydro Electric Systems Inc.
Attention: Ms. Cristina Birceanu

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

- Chrysalis Consulting
Attention: Ms. Evelyn (Lin) Grist

- Mr. John Barker & Ms. Barbara Barker

- Power Workers' Union
Attention: Mr. Paul Reece

- Power Workers' Union
c/o Paliare Roland Rosenberg Rothstein LLP
Attention: Mr. Richard Stephenson

- Power Workers' Union
c/o Elenchus Research Associates Inc.
Attention: Mr. Bayu Kidane & Ms. Kim McKenzie