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File 95393

September 18, 2018

## VIA COURIER and RESS FILING

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COUNSEL

Stephen Goudge, Q.C.

lan G. Scott, Q.C., O.C. (1934 - 2006)

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 Veridian Connections Inc. and Whitby Hydro Electric for approval to amalgamate and continue operations as a single new local electricity distribution company (EB-2018-0236)

We are retained to act as counsel to Power Workers' Union. We are responding to the Board's Notice regarding this Application.

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 Whitby Hydro Electric). 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 Whitby Hydro Electric may fall under the PWU's representation. The PWU seeks to ensure that, in the event the application is approved, that it proceeds in a manner that ensures the reliability and quality of electricity service.

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,

Richard Stephenson Counsel Paliare Roland 155 Wellington Street West 35th Floor Toronto, Ontario M5V 3H1 e-mail: Richard.Stephenson@paliareroland.com Telephone: 416-646-4325 Fax: 416-646-4335

## 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 Fax: 416-348-9930

## 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 Fax: 416-348-9930 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 POLAND ROSENBERG ROTHSTEIN LLP

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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