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COUNSEL Stephen Goudge, Q.C.

counsel Ian G. Scott, Q.C., O.C. (1934 - 2006) September 27, 2018

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File 95404

VIA COURIER and RESS FILING

Ms. Kirsten 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 Ontario Power Generation Inc. for an order or orders approving a payment amount for hydroelectric generating facilities prescribed under Ontario Regulation 53/05 of the Act, as amended, and the disposition of balances in its deferral and variance accounts as of December 31, 2017 (EB-2018-0243)

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

By way of this letter, the 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. Attached please find a list of PWU employers.

The PWU was a full-time intervenor in OPG's previous payment amounts application (EB-2016-0152). The PWU intends to be a full-time intervenor and will participate in all aspects of the hearing. The PWU's concern continues to be OPG's ongoing ability to maintain and invest in its assets in a manner that ensures their long term reliable and safe operation, as well as the safety of OPG's employees.

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.

Stephenson RPS:pb Encl.

List of PWU Employers

Alectra Utilities (formerly PowerStream) Algoma Power AMEC Nuclear Safety Solutions Atlantic Power Corporation - Calstock Power Plant Atlantic Power Corporation - Kapuskasing Power Plant Atlantic Power Corporation - Nipigon Power Plant BPC District Energy Investments Limited Partnership **Brighton Beach Power Limited Brookfield Power Wind Operations** Brookfield Renewable Power - Mississagi Power Trust Bruce Power Inc. Canadian Nuclear Laboratories (AECL Chalk River) Cogeco Peer 1 Collus Powerstream Compass Group Corporation of the County of Brant Covanta Durham York Renewable Energy Ltd. Entegrus Enwave Windsor Erth Power Corporation (formerly Erie Thames Powerlines) Erth Corporation Ethos Energy Inc. Great Lakes Power (Generation) Grimsby Power Incorporated Halton Hills Hydro Inc. Hydro One Inc. Hydro One CSO (formerly Vertex) Hydro One Sault Ste. Marie (formerly Great Lakes Power Transmission) Independent Electricity System Operator Inergi LP InnPower (Innisfil Hydro Distribution Systems Limited) J-MAR Line Maintenance Inc. 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. Nuclear Waste Management Organization Nuvia Canada Ontario Power Generation Inc. Orangeville Hydro Limited Portlands Energy Centre PUC Services Quality Tree Service

Rogers Communications (Kincardine Cable TV Ltd.) Sioux Lookout Hydro Inc. SouthWestern Energy The Electrical Safety Authority Tillsonburg Hydro Toronto Hydro TransAlta Generation Partnership O.H.S.C. Westario Power Whitby Hydro Energy Services Corporation

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