

# KOSKIE MINSKY

January 8, 2019

  
Ernie A. Schirru

Direct Dial: 416-595-2142

Direct Fax: 416-204-2893

eschirru@kmlaw.ca

*Via Courier*

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

RECEIVED  
JAN 09 2019  
ONTARIO ENERGY BOARD

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Application under section 86(1)(c), 86(1)(a), 78, 18, 77(5) and 74 of the  
Ontario Energy Board Act, 1998 for the relief necessary to effect Hydro One  
Networks inc. and 1937689 Ontario Inc.'s purchase and consolidation of  
Peterborough Distribution Inc.'s distribution asserts and other related  
approvals – Request for Intervenor Status  
OEB File No. EB-2018-0242**

We are counsel to the International Brotherhood of Electrical Workers, Local 636 (the "IBEW") and have been retained with respect to this matter.

The IBEW hereby requests Intervenor status in the above-noted proceeding in accordance with Rule 22 of the Rules of Practice and Procedure and the OEB's Notice of Hearing.

The IBEW represents approximately 60 employees of Peterborough Distribution Inc. including employees who would be directly involved in work in the service territory that is the subject of the application. As a result, IBEW members and their current and future work opportunities will be directly affected by the application and its outcome. The Collective Agreement in place between the IBEW, Local 636 and Peterborough Utilities Services Inc., Peterborough Distribution Inc., Peterborough Utilities Inc. and including wholly owned subsidiaries of these related companies is set to expire March 31, 2022.

More generally, the IBEW represents a large portion of the employees working in Ontario's electricity industry, including almost 3300 people working for numerous LDCs, including the following employers: Brantford Power, Burlington Hydro, Cambridge Hydro, Canadian Niagara Power, Centre Wellington Hydro, Collus Power, Eastern Ontario Power, Elk Energy, Entegrus, Enwin Utilities, Festival Hydro, Hydro Ottawa, Kingston Utilities, Kitchener-Wilmot Hydro, Midland Power, Oakville Hydro, Orillia Power Distribution, Oshawa PUC, Peterborough Utilities, Waterloo North Hydro, Welland Hydro, Wasaga Distribution Inc., and several more.

It follows that the IBEW is interested in any regulatory proceeding that will affect the provision of electricity service adequacy, reliability and safety to consumers

The IBEW's intervention will not lead to any significant delay. The IBEW does not intend to adduce any of its own evidence in the proceeding. The IBEW intends to participate in any

written or oral hearing of this matter, and in written or oral submissions or any other process ordered by the Board. The IBEW understands and fully accepts its obligation to participate responsibly in the proceeding. We confirm that the IBEW will not be requesting eligibility for costs in this proceeding.

We request that copies of all communications with regard to the IBEW's participation in this proceeding be provided to:

- (i) **IBEW Local 636**  
7170 West Credit Avenue, Unit 2B  
Mississauga, ON L5N 6C6  
Telephone: 905 286 0330 Fax: 905 286 0042  
Attention: Mr. Barry Brown, Business Manager  
Email: barry053@sympatico.ca  
Attention: Mr. Mike Hall, Business Representative  
Email: mhalllocal636@gmail.com

And to

- (ii) **Koskie Minsky LLP**  
900- 20 Queen Street West  
Toronto, ON M5H 3R3  
Telephone: 416 595 2142 Fax: 416 204 2893  
Attention: Mr. Ernie Schirru  
Email: eschirru@kmlaw.ca  
Attention: Ms. Lauren Tarasuk  
Email: ltarasuk@kmlaw.ca

Yours truly,

**KOSKIE MINSKY LLP**



For  
Ernie A. Schirru  
EAS:ar  
c (via email)

**IBEW Local 636**  
Attention: Mr. Barry Brown and Attention: Mr. Mike Hall

**Hydro One Networks Inc.**  
Attention: Ms. Linda Gibbons  
**Osler, Hoskin & Harcourt LLP**  
Attention: Mr. Richard King

**Peterborough Distribution Inc.**  
Attention: Mr. John Stephenson  
**City of Peterborough**  
Attention: Ms. Sandra Clancy  
**Borden Ladner Gervais LLP**  
Attention: Mr. J. Mark Rodger