

Chris G. Paliare
Ian J. Roland
Ken Rosenberg
Linda R. Rothstein
Richard P. Stephenson
Nick Coleman
Donald K. Eady
Gordon D. Capern
Lily I. Harmer
Andrew Lokan
John Monger
Odette Soriano
Andrew C. Lewis
Megan E. Shortreed
Massimo Starnino
Karen Jones
Robert A. Centa
Nini Jones
Jeffrey Larry
Kristian Borg-Olivier
Emily Lawrence
Tina H. Lie
Jean-Claude Killey
Jodi Martin
Michael Fenrick
Ren Bucholz
Jessica Latimer
Lindsay Scott
Alysha Shore
Denise Cooney
Paul J. Davis
Danielle Glatt
Lauren Pearce
Elizabeth Rathbone
Daniel Rosenbluth
Glynnis Hawe
Emily Home
Hailey Bruckner
Charlotté Calon

COUNSEL
Stephen Goudge, Q.C.

HONORARY COUNSEL
Ian G. Scott, Q.C., O.C.
(1934 - 2006)

Richard P. Stephenson

T 416.646.4325 Asst 416.646.7419

F 416.646.4301

E richard.stephenson@paliareroland.com

www.paliareroland.com

File 96407

July 10, 2019

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: EB-2019-0018 – Alectra Rates Application

We are retained to act as counsel to Power Workers' Union ("PWU"). We are responding to the Board's Notice regarding this Application. We apologize for the lateness of this request, however, the application has just come to our attention.

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, including those of the Applicant. Attached please find a list of PWU employers.

The PWU intends to be a full-time intervenor and will participate in all aspects of the hearing. The PWU's concern is with Alectra'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 Alectra 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.

Yours very truly,

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP


Richard P. 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
 Bracebridge Generation
 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)
 Lakeland Power Distribution
 London Hydro Corporation
 Milton Hydro Distribution Inc.
 New Horizon System Solutions
 Newmarket Tey/Midland Hydro Ltd.
 Nuclear Waste Management Organization
 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
Tillsonburg Hydro Inc.
The Electrical Safety Authority
Toronto Hydro
TransAlta Generation Partnership O.H.S.C.
Westario Power
Whitby Hydro Energy Services Corporation

Doc 2948949 v1