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September 21, 2020

## VIA RESS FILING and EMAIL

Ms. Christine E. Long Board Secretary Ontario Energy Board 2300 Yonge Street, 27th Floor, P.O. Box 2319 Toronto, ON M4P 1E4

Dear Ms. Long,

Re: Alectra Utilities Corporation IRM Application for 2021 Electricity Distribution Rates and Charges (EB-2020-0002)

We are retained to act as counsel to the Power Workers' Union (PWU). We are responding to the Board's Notice regarding the 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, 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 the financial viability of the utility, and whether the proposed rates and charges will permit the utility to undertake the work necessary to ensure the safe and reliable operation of the facilities used to serve the affected customers.

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:

John Sprackett
Power Workers' Union
244 Eglinton Avenue East
Toronto, ON M4P 1K2
e-mail: sprackettj@pwu.ca

And,

Richard Stephenson Counsel Paliare Roland 155 Wellington Street West 35th Floor Toronto, Ontario M5V 3H1

e-mail: richard.stephenson@paliareroland.com

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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 PWU will not be seeking costs in respect of this proceeding.

Yours very truly, PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

Richard P. Stephenson

## **List of PWU Employers**

Abraflex (2004) Ltd.

Alectra Utilities (formerly PowerStream)

Algoma Power

Aptum (formerly Cogeco Peer 1)

Atlantic Power Corporation - Calstock Power Plant

Atlantic Power Corporation - Kapuskasing Power Plant

Atlantic Power Corporation - Nipigon Power Plant

Atura - Halton Hills Generating Station

Atura - Napanee Generating Station

Atura - Portlands Energy Centre

Bracebridge Generation

**Brookfield Power Wind Operations** 

Brookfield Renewable Power - Mississagi Power Trust

Bruce Power Inc.

Canadian Nuclear Laboratories (AECL Chalk River)

Cochrane Telecom Services

Compass Group

Corporation of the County of Brant

Covanta Durham York Renewable Energy Ltd.

Elexicon (formerly Whitby Hydro)

**Enwave Windsor** 

EPCOR Electricity Distribution Ontario Inc.

Erth Power Corporation (formerly Erie Thames Powerlines)

Erth Holdings Inc

Ethos Energy Inc.

Great Lakes Power (Generation)

**Greenfield South Power Corporation** 

**Grimsby Power Incorporated** 

Halton Hills Hydro Inc.

Hvdro 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)

Kinectrics Inc.

Kitchener-Wilmot Hydro Inc.

Lakeland Power Distribution

Laurentis Energy Partners

London Hydro Corporation

Milton Hydro Distribution Inc.

New Horizon System Solutions

Newmarket -Tay/Midland Hydro Ltd.

**Nuclear Waste Management Organization** 

Ontario Power Generation Inc.

Orangeville Hydro Limited

**PUC Services** 

**Quality Tree Service** 

Rogers Communications (Kincardine Cable TV Ltd.)

Sioux Lookout Hydro Inc.

SouthWestern Energy

Synergy North Corporation

Tillsonburg Hydro Inc.

The Electrical Safety Authority

## PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

Toronto Hydro TransAlta Generation Partnership O.H.S.C. Westario Power