

Chris G. Paliare lan 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 Catherine Fan Douglas Montgomery Shawna Leclair Jesse Wright

COUNSEL Stephen Goudge, Q.C.

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

HONORARY COUNSEL

September 29, 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: Hydro One Networks' 2018-2022 Distribution Rate Application – 2021 Annual Rate Update (EB-2020-0030)

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:

Richard P. Stephenson

- T 416.646.4325 Asst 416.646.7419
- F 416.646.4301
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File 97915

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

And,

Richard Stephenson Counsel Paliare Roland 155 Wellington Street West 35th Floor Toronto, Ontario M5V 3H1 e-mail: <u>richard.stephenson@paliareroland.com</u> 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 PWU will not be seeking costs in respect of this proceeding.

Yours very truly, PALIARE ROLAND ROSENBERG ROTHSTEIN LLP nard/P. Stephenson Ric **RPS:pb** 

Attach.

## 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. Hydro One Inc. Hydro One CSO (formerly Vertex) Hydro One Sault Ste. Marie (formerly Great Lakes Power Transmission) Independent Electricity System Operator Inerai 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

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

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