

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
Charlott   Cal  n
Catherine Fan
Douglas Montgomery
Shawna Leclair
Jesse Wright

COUNSEL
Stephen Goudge, Q.C.
HONORARY COUNSEL
Ian 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 98198

January 19, 2021

VIA RESS FILING and EMAIL

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

Dear Ms. Long,

Re: EB-2020-0290 – OPG 2022-2026 Payment Amounts

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 OPG, and whether the proposed rates and charges will permit it 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 Ives
Power Workers' Union
244 Eglinton Avenue East
Toronto, ON M4P 1K2
e-mail: jives@pwu.ca

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,

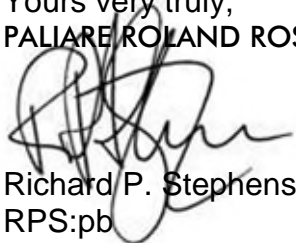
Kim McKenzie
Consultant
Elenchus Research Associates
34 King Street East, Suite 600
Toronto, Ontario M5C 2X8
e-mail: kmckenzie@elenchus.ca
Telephone: 416-640-1894
Fax: 416-348-9930

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

Yours very truly,

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

A handwritten signature in black ink, appearing to read 'R. Stephenson', is written over the printed name and firm name.

Richard P. Stephenson
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
 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

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

Doc 3622018 v1