

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

February 2, 2020

Re: **EB-2020-0290 - Ontario Power Generation Inc. ("OPG") - Intervenor Request on behalf of CanAtom Power Group, a joint venture between SNC Lavalin Nuclear Inc. and Aecon Construction Group Inc. ("CanAtom")**

Dear Ms. Long:

CanAtom has received the Board's Notice of the captioned application by OPG concerning its request for cost recovery related to OPG's nuclear generating facilities.

CanAtom is party to several multi-year contracts with OPG related to the refurbishment or replacement of facilities at OPG's Darlington Nuclear Generating Station (the "Darlington Refurbishment Contracts"). Costs incurred by OPG under the Darlington Refurbishment Contracts are expected to be among those that may be a subject of review by the Board in the captioned application.

CanAtom wishes to participate in the application actively and fully, as intervenors pursuant to Rule 22 of the Board's Rules of Practice and Procedure, but their interest and their participation will be limited to any issues that may arise from the eligibility for recovery of costs related to the Darlington Refurbishment Contracts. CanAtom does not propose to place any issues before the Board panel for determination, other than those that are raised by the other participants, or that necessarily arise in response thereto. CanAtom does not believe that their participation will in any way add to the complexity or result in delay of the proceedings.

CanAtom does not seek eligibility to recover the costs of its participation. They will participate in the English language.

They request an electronic copy of the application and all written evidence or other proceedings filed to date, or links to the place(s) on the Board's website where such material is available. They wish to be provided with notice and electronic copies of all future documents filed, and steps taken, in the application as they occur, including all evidence filed by any participant, all motions, submissions, procedural orders, and other documents exchanged among parties on the Board's service list, the Board panel, and Board staff in connection with issues raised on the application that relate to the Darlington Refurbishment Contracts. They seek the rights, if so advised, to file evidence and to make submissions before the Board panel, including the right to examine and cross-examine witnesses, to make submissions through counsel, and to attend by personal representatives if an oral hearing is held on any issues that affect their interests.

For the purposes of service and delivery of documents in the proceeding, CanAtom has appointed the following legal counsel to act on their behalf, and to receive service of all documents:

Niguel Mousseau, Senior Counsel
Aecon Group Inc.
154 Sheldon Drive


Cambridge, ON N1R 7K9
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and

M. Philip Tunley, Barrister
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Toronto, ON M5A 1R7
Phone: 647 964 3495
Email: phil@tunleylaw.ca

This letter of intervention is respectfully submitted on behalf of CanAtom. Should the Board require any further information in that regard, please contact the writer.

Yours truly,



M. Philip Tunley,
Barrister
MPT/am