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File 98995

September 14, 2020

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-2021-0110

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 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
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Toronto, Ontario M5V 3H1
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And,

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And,

Mr. Bayu Kidane
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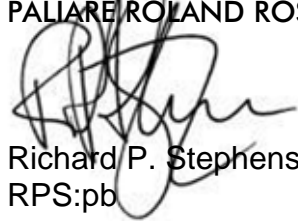
And,

Brady Yauch
Power Advsiory LLC
55 University Avenue, Suite 700
Toronto, ON M5J 2H7
e-mail: byauch@poweradvisoryllc.com

In addition to electronic copies of evidence and communications, please provide one hard copy of the Application and any other supporting materials to Bayu Kidane, 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
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

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