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File 100870

February 7, 2023

VIA RESS FILING and EMAIL

Ms. Nancy Marconi,
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Marconi,

Re: EB-2022-0317 – Elexicon Energy Inc. – Application for Z-Factor

We are counsel to the Power Workers' Union (PWU). We are responding to the Board's Notice regarding the above-noted application.

The PWU hereby requests intervenor status in this proceeding. 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, including whether the proposed cost recovery is consistent with the utility's ongoing ability to ensure the safe and reliable operation of the facilities used to serve the affected customers.

The PWU has retained myself and Richard Stephenson of Paliare Roland for legal representation and Bayu Kidane and Andrew Blair of Econalysis Consulting Services 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
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And,

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

Yours very truly,
PALIARE ROLAND ROSENBERG ROTHSTEIN LLP



Daniel Rosenbluth
DR:ab

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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