SEC Interrogatory #2

Interrogatory

Reference: p. 6

With respect to the legal challenge to Bill 124:

a. Please provide the date on which OPG first became aware of the legal challenge to Bill 124; i) generally, and ii) specifically the challenges brought by each of the Power Workers Union ("PWU") and the Society of United Professionals ("Society").
b. Please provide a copy of any evidence filed in the legal challenge that was prepared, in full or in part, by OPG (e.g. affidavits).

Response

a. OPG would have first become aware of legal challenges to Bill 124 after the corresponding Notices of Application were filed.

b. OPG did not submit any evidence and is not aware of any evidence filed by another party that was prepared in full or in part by OPG.