

July 3, 2012

**Via E-mail (boardsec@oeb.gov.on.ca)**

Ms. Kristen Walli  
Board Secretary  
Ontario Energy Board  
PO Box 2319  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Intervention of the Canadian Union of Public Employees, Local One, OEB File No. EB-2012-0064 Application by Toronto Hydro-Electric System Limited**

We are retained to represent the Canadian Union of Public Employees, Local One, (“CUPE, Local One” or “the Union”) in the above-captioned matter.

Further to the June 27, 2012 Notice of Application and Notice of Hearing issued in this matter, please accept the following as the Union’s request to the Ontario Energy board (OEB) for Intervenor status in EB-2012-0064.

**The intervenor**

The Union is a “Trade Union” within the meaning of the Labour Relations Act, 1995, and is the sole bargaining agent for approximately 1200 inside and outside employees of Toronto Hydro-Electric System Limited (“THESL”).

**The interest of the intervenor and grounds for the intervention**

The Union and its members have unique knowledge in respect of the context giving rise to the present Application. Furthermore, as the sole bargaining agent for the above-noted employees, the Union has a substantial interest in the financial health of THESL and, in its capacity as bargaining agent, CUPE, Local One seeks to participate in regulatory processes that relate to the have direct bearing on the safe and efficient distribution and marketing of electricity to consumers in the Greater Toronto Area.



### **Scope of intended participation**

The Union intends to intervene on the issue of the proposal for changes to rates put forward by THESL to the extent that the outcome of the Application may have material implications for CUPE One members. The Union intends to participate in this proceeding by, if necessary: submitting information requests; participating in pre-hearing and/or settlement conferences; cross-examining witnesses in any oral hearing that is scheduled; and, making submissions in final argument to the Board.

### **Request on costs**

The Union requests that the Board find it eligible to receive a costs award and intends to seek costs on the basis that its contribution is invaluable to the proceeding, and its members' fundamental interests will be directly impacted by the Board's ultimate decision.

### **The hearing**

The Union has a preference that an oral hearing be held in this matter and does not intend to participate in the hearing using the French language.

### **The Union's representatives**

We ask that you provide the Union's representatives, listed below, with copies of all materials filed in this proceeding.

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Sack Goldblatt Mitchell LLP  
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We look forward to the Board's response. If you have any questions please do not hesitate to contact the undersigned.

Sincerely,



Stephanie Hobbs  
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c.c. John Camilleri

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