

October 26, 2012

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Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
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Dear Ms. Walli

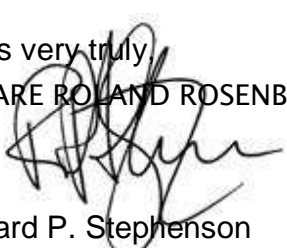
**Re: Revised Proposed Amendments to the Distribution System Code
(EB-2012-0301)**

The Power Workers' Union ("PWU") represents a large portion of the employees working in Ontario's electricity industry.

The PWU is committed to participating in regulatory consultations and proceedings to contribute to the development of regulatory policy and structure that ensures ongoing service quality, reliability and safety at a reasonable price for Ontario customers. To this end, the PWU provides the following comments on revised proposed amendments to the Distribution System Code.

We hope you will find the PWU's comments useful.

Yours very truly,
PALIARE ROLAND ROSENBERG ROTHSTEIN LLP


Richard P. Stephenson

RPS:km

cc: John Sprackett
Judy Kwik

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Revised Proposed Amendments to the Distribution System Code

Submission of the Power Workers' Union

1 BACKGROUND

On July 27, 2012 the Ontario Energy Board ("Board") issued a Notice of Proposal to Amend the Distribution System Code ("DSC") the purpose of which was to provide additional time for applicants of large embedded generation facilities (>10 MW) that require transmission upgrades to sign a Connection Cost Agreement ("CCA") for the facility with the distributor while maintaining their capacity allocation. The Board's proposal was that the timing for large generation facilities that require transmission upgrades be required to sign a CCA within 9 months of capacity allocation rather than the 6 months currently stated in the DSC.

Subsequently, the Board received comments from stakeholders including the PWU which supported the Board's proposed amendment.

On October 11, 2012, the Board advised stakeholders that it had determined that revisions should be made to the proposed July amendments to reflect comments regarding the length of time allowed for the signing of a CCA. The revised proposed amendments state that where a Transmission System Impact Assessment ("Tx SIA") is required, the applicant shall have 9 months to sign a CCA; and, where transmission upgrades are required, the applicant shall have 17 months to sign a CCA from the date on which the applicant received a capacity allocation for the facility.

2 THE PWU'S COMMENTS

In consideration of the reasons provided by Hydro One and the OPA in their comments as to why longer timelines than those proposed in the July amendments are needed, the PWU is convinced that the revised proposed amendments are appropriate.

The PWU appreciates the opportunity to provide comments and to participate in future initiatives relating to this matter.

All of which is respectfully submitted.