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File 96579

September 3, 2019

VIA COURIER and RESS FILING

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

Dear Ms. Walli,

Re: EB-2019-0178 – B2M Limited Partnership (“B2M”) Application

We are retained to act as counsel to Power Workers' Union (“PWU”). We are responding to the Board's Notice regarding this 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 B2M's ongoing ability to maintain and invest in its assets in a manner that ensures their long term reliable and safe operation, as well as the safety of B2M employees.

The PWU has retained Richard Stephenson of Paliare Roland for legal representation and Bayu Kidane and Kim McKenzie of Elenchus Research Associates as consultants in this proceeding. Please provide copies of all communications with regard to the PWU's participation to:

Paul Reece, Chief of Staff
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And,

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In addition to electronic copies of evidence and communications, please provide one hard copy of the Application and any other supporting materials to Kim McKenzie, and one hard copy to counsel, Richard Stephenson.

The Power Workers' Union will not be seeking costs in respect of this proceeding.

Yours very truly,
PALIARE ROLAND ROSENBERG ROTHSTEIN LLP



Richard P. Stephenson
RPS:pb

Encl.

List of PWU Employers

Alectra Utilities (formerly PowerStream)
Algoma Power
AMEC Nuclear Safety Solutions
Atlantic Power Corporation - Calstock Power Plant
Atlantic Power Corporation - Kapuskasing Power Plant
Atlantic Power Corporation - Nipigon Power Plant
BPC District Energy Investments Limited Partnership
Bracebridge Generation
Brighton Beach Power Limited
Brookfield Power Wind Operations
Brookfield Renewable Power - Mississagi Power Trust
Bruce Power Inc.
Canadian Nuclear Laboratories (AECL Chalk River)
Cogeco Peer 1
Collus Powerstream
Compass Group
Corporation of the County of Brant
Covanta Durham York Renewable Energy Ltd.
Entegrus
Enwave Windsor
Erth Power Corporation (formerly Erie Thames Powerlines)
Erth Corporation
Ethos Energy Inc.
Great Lakes Power (Generation)
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)
J-MAR Line Maintenance Inc.
Kenora Hydro Electric Corporation Ltd.
Kinectrics Inc.
Kitchener-Wilmot Hydro Inc.
Lake Superior Power Inc. (A Brookfield Company)
Lakeland Power Distribution
London Hydro Corporation
Milton Hydro Distribution Inc.
New Horizon System Solutions
Newmarket Tey/Midland Hydro Ltd.
Nuclear Waste Management Organization
Ontario Power Generation Inc.

Orangeville Hydro Limited
Portlands Energy Centre
PUC Services
Quality Tree Service
Rogers Communications (Kincardine Cable TV Ltd.)
Sioux Lookout Hydro Inc.
SouthWestern Energy
Tillsonburg Hydro Inc.
The Electrical Safety Authority
Toronto Hydro
TransAlta Generation Partnership O.H.S.C.
Westario Power
Whitby Hydro Energy Services Corporation

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