

August 2, 2006

Kirsten Walli, Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, Ontario M4P 1E4

**Re: Ontario Energy Board Staff Proposal Minimum Filing Requirements for Transmission and Distribution Rate Applications and Leave to Construct Projects, EB-2006-0170.**

The Power Workers' Union ("PWU") represents a large portion of the employees working in Ontario's electricity industry and has utmost interest in initiatives that impact the energy industry and the provision of ongoing service quality and reliability to customers. Attached please find a list of PWU employers.

The PWU appreciates the opportunity to provide comments on the Ontario Energy Board Staff Proposal on Minimum Filing Requirements for Transmission and Distribution Rate Applications and Leave to Construct Projects ("proposal").

The PWU participated on the OEB's Technical Advisory Team on Transmission Infrastructure Investment Filing Requirements initiated in the fall of 2005 (EB-2005-0470). The PWU is pleased that in coming up with the proposal on filing requirements for Leave to Construct applications, Board Staff appear to have taken into account input provided by the Technical Advisory Team in that process.

In addition, the PWU provides the following comment.

In the PWU's view, the filing requirements described in Chapter 5 ("Prior to the approval of an Integrated Power System Plan: Minimum filing requirements for the approval of a capital budget for a transmission project in a rate application or for the approval of projects under section 92 of the OEB Act") ought to encourage ongoing improvement of transmission system reliability and service quality by explicitly including "projects to improve system reliability and service quality performance" under the category of discretionary projects. Doing so will also provide consistency between the projects listed that may be included as discretionary projects and the proposal's indicated intent that discretionary projects are those proposed to enhance transmission system performance to the benefit of the users.

We hope you will consider our comment.

Yours truly,

Don MacKinnon  
President

## **List of PWU Employers**

Atomic Energy of Canada Limited (Chalk River Laboratories)  
Barrie Hydro  
BPC District Energy Investments Limited Partnership  
Brant County Power Incorporated  
Brighton Beach Power Limited  
Brookfield Power – Mississagi Operations  
Brookfield Power – Lake Superior Operations  
Bruce Power Inc.  
Corporation of the City of Dryden - Dryden Municipal Telephone  
Corporation of the County of Brant  
Electrical Safety Authority  
EPCOR Calstock Power Plant  
EPCOR Kapuskasing Power Plant  
EPCOR Nipigon Power Plant  
EPCOR Tunis Power Plant  
Erie Thames Services Corporation  
Goldman Hotels Inc. - Hockley Highlands Inn & Conference Centre  
Great Lakes Power Limited  
Grimsby Power Incorporated  
Halton Hills Hydro Inc.  
Hydro One Inc.  
Independent Electricity System Operator  
Inergi LP  
Innisfil Hydro Distribution Systems Limited  
Kenora Hydro Electric Corporation Ltd.  
Kincardine Cable TV Ltd.  
Kinectrics Inc.  
Kitchener-Wilmot Hydro Inc.  
London Hydro Incorporated  
Middlesex Power Distribution Corporation  
Milton Hydro Distribution Inc.  
Mississagi Power Trust  
New Horizon System Solutions  
Newmarket Hydro Ltd.  
Norfolk Power Distribution Inc.  
Ontario Power Generation Inc.  
Orangeville Hydro Limited  
PUC Services Inc.  
Sioux Lookout Hydro Inc.  
Sodexo Canada Ltd.  
TransAlta Energy Corporation - O.H.S.C. Ottawa  
Vertex Customer Management (Canada) Limited  
Whitby Hydro Energy Services Corporation

