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October 12, 2007

File 15162

VIA FAX AND EMAIL

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

Dear Ms. Walli:

**Re: Great Lakes Power – Hydro One Connections Procedure
EB-2006-0189 and EB-2006-0200**

We are counsel for Power Workers' Union ("PWU"). The PWU was an intervenor in the above-referenced Board proceedings.

We are in receipt of correspondence to you from Hydro One dated October 9, 2007, enclosing a Notice of Motion filed by Hydro One in respect of the Board's decision in this matter.

We are writing to indicate our intention to support Hydro One's motion. In addition, we wish to emphasize to the Board the importance of this motion, and the need for the Board to conduct a full oral hearing of the motion.

The PWU submits that Hydro One's motion raises serious issues which warrant the Board's full and complete consideration. In particular, the PWU is concerned with the aspect of Hydro One's motion regarding the Board's interpretation of s. 71 of the *Ontario Energy Board Act*, 1998 (the "Act"). The Board's interpretation of s. 71 directly and adversely impacts PWU members. PWU members are responsible for providing some of the services provided by Hydro One which the Board has found to be contrary to its interpretation of s. 71 of the *Act*.

In support of its position that Hydro One's motion with respect to the Board's interpretation of s. 71 should be allowed, the PWU will be submitting, *inter alia*, that:

- (a) it was directly affected by the Board's decision with respect to the interpretation of s. 71 of the *Act*;

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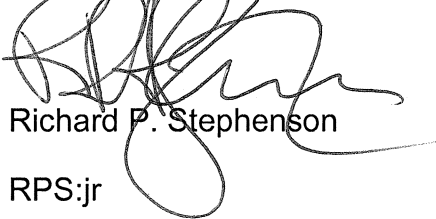
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(1934 - 2006)

- (b) the PWU did not receive reasonable notice that a decision by the Board with respect to this issue was a potential outcome of the hearing;
- (c) the PWU had no reasonable opportunity to make submissions with respect to this issue;
- (d) the Board's understanding of this issue would have been assisted by a complete evidentiary record in relation to this issue;
- (e) there is good reason to doubt the correctness of the Board's interpretation of s. 71.

We trust this information is of assistance to the Board. We look forward to the Board's advice with respect to the scheduling of this motion.

Yours very truly,

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP



Richard P. Stephenson

RPS:jr

cc: John Sprackett
Judy Kwik
All Participants in these proceedings (*via email*)

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