

November 19, 2010

Via Facsimile (416-440-7656)

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

Dear Ms. Walli:

**Re: Toronto Hydro-Electric Systems Limited - Interrogatories of CUPE Local One -
Request for Extension of Time for Filing
OEB File No. EB-2010-0142**

We are in receipt of the Board's letter of today's date denying the request of CUPE Local One for a one-week extension of time in which to file its interrogatories.

The Board denies the request on the basis that no reason was provided in support of the need for extension. The Board also states that the one-week extension is significantly consequential that it may impact Toronto Hydro's ability to provide its responses in a timely fashion. In response to the Board's letter, and in support of the request by CUPE Local One for an extension of time, please be advised of the following:

1. Reason for Requesting an Extension:

CUPE Local One is currently in process of moving its office to a new address, which has given rise to a number of unforeseen difficulties in respect of office administration. Most notably, the Union has had an unanticipated interruption to its office computer network services, with associated loss of access to email, internet services, and electronic databases.

2. The Length of the Extension Requested:

In light of the circumstances referred to in the preceding paragraph, the Union submits that its request for an extension of one-week is entirely reasonable. Moreover, giving due consideration to the time frames in issue, the relative volume of interrogatories submitted by other parties to date, the resources of the utility, and the anticipated scope of the Union's interrogatories, a one-week extension of time will not give rise to any prejudice in respect of the Utility's capacity to provide responses in a timely fashion. However, notwithstanding the Union's position that its



request is reasonable and will not give rise to any prejudicial delay, CUPE Local One wishes to advise the Board that it will make every effort to file its interrogatories by no later than Tuesday, November 23, 2010.

Finally, please note that in the event that it becomes necessary to do so, CUPE Local One intends to make a formal request for reconsideration by the Board of any decision to deny its request for an extension of time for filing its interrogatories and reserves the right to file full submissions in support of any such request for reconsideration.

Sincerely,



Stephanie Hobbs
SH:dm/cope 343

c.c. All registered parties
J. Mark Rodger - BLG (*via email*)
John Camilleri - CUPE Local One (*via fax*)

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