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July 29, 2011

via RESS e-filing – signed original to follow by courier

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

Dear Ms. Walli:

**Re: Toronto Hydro-Electric System Limited's ("THESL")
2011 Electricity Distribution Rates Application – Procedural Order No. 10
OEB File No. EB-2010-0142**

THESL has received the above-noted Procedural Order.

THESL is prepared to file the required evidence and will use best efforts to do so as soon as possible. However, for reasons explained below THESL wishes to advise the Board that THESL cannot do so by the August 31 date specified in Procedural Order No. 10.

First, while the cost allocation studies filed by THESL in this proceeding to date are based on 2009 data, THESL's proposal for a modified cost allocation study including the separately defined suite metering class will need to be based on 2012 data, both for the reason of currency and because the suite metering rate will become effective in 2012. To do otherwise would imply a mismatch between the underlying data and corresponding revenue requirements as between THESL's 2012 traditional rates and the new suite metering rate. Forecast data for 2012 is now in the process of being finalized.

Second, THESL faces a resource constraint internally due in large part to retirements of internal expert resources in this area. The Board will appreciate that THESL cannot control the election by individuals to retire on short notice. The work to be completed for this purpose cannot be undertaken by general staff because it is highly specialized and requires detailed knowledge of the specific subject matter. THESL is working diligently to bridge the gap created by these retirements but it cannot do so by the stated deadline.

As a result THESL proposes and respectfully requests that the Board amend Procedural Order No. 10 to provide for a filing date of October 17th for the evidence required from THESL. THESL believes that this extension of the filing deadline will not jeopardize the potential to implement the new suite metering rate on May 1, 2012.

Yours truly,

[original signed by Colleen Richmond for]

Glen A. Winn
Manager, Regulatory Applications & Compliance

:GAW/CJM/acc

cc: J. Mark Rodger, Counsel for THESL, by electronic mail only
Intervenors of Record for EB-2010-0142, by electronic mail only