



August 12, 2011

BY EMAIL/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: Whitby Hydro Electric Corporation (EB-2011-0206)
Application for 2012 Electricity Distribution Rates – 3rd Generation Incentive
Rates Mechanism (3GIRM) Deadline**

On June 30th, 2011, Whitby Hydro Electric Corporation ("Whitby Hydro") communicated concerns regarding the timelines identified to file a complete and thorough 3GIRM application for 2012. As one of several electricity distributors with a Jan 1st rate year, the deadline communicated by the OEB of August 15th, was an aggressive timeline especially given that unanticipated (additional) items would be necessary to address in the application (ie. LRAM, disposition of PILs 1562 accounts etc.), based information provided in the updated filing requirements (issued June 22, 2011) and reiterated in the OEB rate application webcast on June 28th, 2011, as well as recent Board decisions.

In addition to the new items necessary to address in the application, the excel models developed by the OEB to support the 2012 3GIRM were not expected to be available until the end of July (as per Board Staff communication during the June webcast). As of the date of this letter, the final 3GIRM models have not yet been released to electricity distributors for use in completing the application. As a first time 3GIRM filer, adequate time to understand and work with the 3GIRM model requirements and perform various analyses, review of rates and the completed application is especially critical to the overall process and quality of the application.

Once the updated filing requirements and timelines were released, Whitby Hydro made attempts to advise internal staff and outside resources that would be engaged in the application process to continue their efforts towards preparing, analyzing and reviewing the application as soon as possible. Unfortunately, with the delay in the release of the final 3GIRM models, the availability of critical staff supporting the application becomes another concern.

Under the assumption that a final tested version of the OEB's 3GIRM model/s, including relevant instructions will be available shortly, Whitby Hydro still believes that the previously requested extension of September 30, 2011 may be an achievable deadline and asks that

the Board extend the filing deadline accordingly. Whitby Hydro also respectfully requests that the Board give priority to its application ahead of the first group of 3GIRM filers who have a rate year effective May 1st, so that the application may be approved so that rates can be implemented and effective for January 1st 2012.

Should you require any further information or clarification, please contact me directly.

Respectfully submitted,

Original Signed by

Ramona Abi-Rashed
Treasurer
905 668-5878
rabirashed@whitbyhydro.on.ca