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August 30, 2011

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

Dear Ms. Walli:

Re: Oshawa PUC Networks Inc. (ED-2002-0560) 2012 Cost of Service Rate Application (EB-2011-0073)

Oshawa PUC Networks Inc ("OPUCN") has been working diligently to submit its responses to the interrogatories received from Board staff and intervenors in respect of its 2012 Cost of Service rate Application by the Board's deadline of August 31, 2011, as set out in Procedural Order No.1 ("PO#1). However, we will not be able to file our responses by that deadline for the following reasons.

- 1. The School Energy Coalition ("SEC") was unfortunately unable to send us their interrogatories until the evening of August 23, 2011, over a week after the deadline set out in PO#1. Over 50 interrogatories were put to OPUCN by SEC, and we will require additional time to prepare and deliver responses to them.
- 2. In total, with the SEC interrogatories, OPUCN has received approximately 235 interrogatories from Board staff and intervenors. OPUCN staff are working hard to prepare complete responses to these questions, but the volume of interrogatories necessitates additional time to provide the responses.
- 3. Several major policy decisions with direct and substantial impacts on the Application have been released by the Board and Board staff since the Application was filed on June 1, 2011. OPUCN has been attempting to address these changing requirements and its interrogatory responses will reflect them, but complying with these policies requires more time than has been available to date. The policies include the following:

- i. June 13: "Addendum to the Report of the Board: Implementing International Financial Reporting Standards in an Incentive Rate Mechanism Environment" set out the regulatory policy for transition to IFRS for utility rates rebased using the cost of service methodology.
- ii. June 22: An updated version of Chapter 2 of the "Filing Requirements for Transmission and Distribution Applications" was released. Among other changes, this update, included changes to the treatment of standard meters and transition to IFRS.
- iii. June 22: A revision to "Guideline G-2008-0001 Electricity Distribution Retail Transmission Service Rates" made substantial changes to the Application in this area necessary.
- iv. August 5: "Staff Report to the Board: Implementation of the Revisions to the Board's Electricity Distributor Cost Allocation Policy", including the release of the approved Model and instructions for completing it.

These changes resulted in the issuance of a number of new models and the updates of others as recently as last week, as follows:

- June 22: Revenue Requirement Workform (RRWF)
- July 29: Deferral / Variance Account Continuity Schedule
- August 5: Cost Allocation Model
- August 23: Income Tax/PILs Workform
- August 26: RTSR Adjustment Model

OPUCN will endeavor to file their responses to interrogatories as soon as possible but no later than September 15, 2011. We understand that an extension of the filing deadline for responses to interrogatories will affect the timeline set out in PO#1, and we respectfully request that the dates set out in that Procedural Order be revised as follows:

- PO#1 provides that "Oshawa shall file with the Board complete responses to the interrogatories and deliver them to the intervenors no later than August 31, 2011." OPUCN proposes that this deadline be revised to September 15, 2011.
- PO#1 provides that "A transcribed Technical Conference will be convened on September 19, 2011, starting at 9:00 a.m. If necessary, the Technical Conference will continue on September 20, 2011, starting at 9:00 a.m." OPUCN proposes that the Technical Conference be rescheduled to begin on Monday, October 3, 2011, starting at 9:00 a.m., continuing if necessary on October 4, 2011, starting at 9:00 a.m.
- PO#1 provides that "Parties participating in the Technical Conference are requested to file with the Board and copy Oshawa and all other parties, by September 14, 2011 a list of issues or questions or matters which they seek to

address or seek clarification on at the Technical Conference." OPUCN proposes that this deadline be revised to September 28, 2011.

We thank you in advance for your consideration in this matter.

Yours truly,

Phil Martin

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