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September 19, 2011

Delivered by Email

Ms. Kirsten Walli, Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

Re: CANDAS Application - OEB File No.: EB-2011-0120

We are writing on behalf of Toronto Hydro-Electric System Limited ("THESL") in connection with the above-noted letter.

As described in our letter dated September 15, 2011, THESL has received interrogatories containing well over 600 questions (nearly 700 to date). In addition to the sheer volume of questions and in many cases, their broad scope, THESL's task is made more difficult and time consuming due to the fact that many of the interrogatories were submitted late, do not pinpoint reference to the evidence, and/or refer to CANDAS' own evidence.

As also described in our September 15 letter, THESL has been using its best efforts to prepare full and complete responses to all relevant interrogatories within the Board's established timelines of seven days from the date that those interrogatories were due (again, several batches were submitted late). THESL writes today to provide the Board the promised update on these efforts.

THESL expects to file its first tranche of responses to interrogatories tomorrow, Tuesday September 20, 2011. It is working on an urgent basis to provide responses to the remaining interrogatories, and will keep the Board and parties apprised of its progress in this regard. In particular, THESL undertakes to inform the Board by Thursday September 22, 2011 of its progress in the event that certain of its responses to interrogatories remain outstanding at that time.

Yours very truly,

BORDEN LADNER GERVAIS LLP

Original signed by J. Mark Rodger
J. Mark Rodger
JMR/jv

copy to: Pankaj Sardana and Amanda Klein, THESL
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