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September 27, 2011

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

## Re: Update to Reply Submission – EB-2011-0224

Bluewater Power Distribution Corporation ("Bluewater Power") provides the following update to our reply submission dated August 9, 2011. That update relates to the following comment found at page 7 of our Reply Submission:

"We also take this opportunity to remind the Board that our ability to implement TOU Billing is tied-to the IESO's ability to meet its deadlines on implementation of R7.2. We have asked for an extension to "a new date of January 2012 or 14 weeks after the start date the Independent Electricity System Operator ("IESO") confirms Bluewater's wave assignment."

It has become clear that the IESO schedule has slipped by approximately 6 weeks, meaning they will not reach their deadline for implementation of R7.2 as contemplated at the time of filing our Reply Submission. At this point in time, it is our best estimate that Bluewater Power is on path for a mid-February TOU Billing Date.

We want to be clear that we are <u>not</u> asking to amend our application for a TOU Billing extension through this update. The nature of our application filed June 6, 2011 was such that it allowed flexibility in the event of a delay at the IESO. The purpose of this letter is to keep the OEB informed of recent developments.

We trust the foregoing is clear, but please do not hesitate to contact the undersigned if there are any questions.

Sincerely,

Alex Palimaka

Vice President Corporate Services & General Counsel

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