



November 16, 2011

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

Re: Middlesex Power Distribution Corporation, 2012 IRM3 Application
Board File No.: EB-2011-0148, EB-2011-0149, EB-2011-0150

Dear Ms. Walli,

On August 2, 2011, the Board issued a letter with respect to the process and deadlines for 2012 IRM applications. This letter established a filing deadline of November 25, 2011 for Middlesex Power Distribution Corp ("MPDC"), for an application to include rates for MPDC's three service territories – MPDC-Main, MPDC-Dutton and MPDC-Newbury. With the exception of a proposal for disposition of Account 1562 Deferred PILs, MPDC expects to file its 2012 IRM application for MPDC-Main, MPDC-Dutton and MPDC-Newbury rates by the November 25, 2011 deadline.

With respect to Account 1562 Deferred PILs, MPDC acknowledges that in the EB-2008-0381 Combined Deferred PILs proceeding decision of June 24, 2011, the Board indicated its expectation that distributors would apply for the final disposition of Account 1562 Deferred PILs with their next rate applications. However, an initial lack of historical accounting and taxation records has made the determination and validation of the MPDC-Main, MPDC-Dutton and MPDC-Newbury Account 1562 balances challenging.

As background, MPDC-Main was acquired by its current owner (Chatham-Kent Energy) on June 30, 2005, pursuant to approval granted by the OEB in its June 24, 2005 decision in EB-2005-0255. MPDC-Main subsequently obtained OEB approval (EB-2008-0332 and EB-2008-0350, Decision and Order issued February 9, 2009) to acquire, and then amalgamate, MPDC-Dutton and MPDC-Newbury. These transactions were completed on April 30, 2009. Many of the pre-acquisition accounting records from the former Middlesex Power, Dutton Hydro and Newbury Power utilities that would assist in the respective Account 1562 dispositions have been difficult to locate. We now believe that we have located all available records, and are currently in the



process of interpreting and validating these records. This includes assessing whether additional information requirements will be necessary, and, if additional information is required, how we might obtain it. To-date, the process has involved extensive searches of corporate archives, numerous information requests to predecessor public accountants and detailed discussions with the Ministry of Finance. Additional information requirements may include further inquiries of predecessor public accountants and /or the previous owners of the acquired distributors.

In the result, despite diligent effort, we will not be in a position to file for Account 1562 disposition at the time that the respective 2012 IRM applications are filed. We therefore respectfully request that the Board grant an extension to January 23, 2012 for MPDC-Main, MPDC-Dutton and MPDC-Newbury to file for disposition of their Account 1562 balances.

If you have any further questions please do not hesitate to contact me at (519) 352-6300, extension 558 or davidferguson@ckenergy.com.

Regards,

[Original Signed By]

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cc: Dan Charron, President of Middlesex Power Distribution Corp.
Chris Cowell, Chief Financial and Regulatory Officer