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Please Reply to the TORONTO OFFICE

March 20 2008 Our File No. 2060552

Ontario Energy Board 2300 Yonge Street 26th Floor Toronto, Ontario M4P 1E4

BY EMAIL

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Ontario Power Generation - Payments for Prescribed Assets - EB-2007-0905

We are writing this letter on behalf of the School Energy Coalition, an intervenor in the above proceeding. As the Board is aware, the Applicant has filed a substantial pile of updated material last Friday, five business days before interrogatories are due. While we were aware that an update was coming, the breadth and depth of the update was a complete surprise. Whole sections were replaced, and many key numbers were changed, several by eight figure amounts.

Our team working on the interrogatories was well-advanced when the update arrived, and it was immediately apparent that, for some parts of the Application, the updates would mean starting again from scratch. Building spreadsheets to calculate ratios and trends, for example, has to some extent been time not well spent because the data has changed materially. The materiality of some OPG proposals and explanations has changed now that the revised numbers are known. There are many other examples.

Under normal circumstances, with the voluminous nature of the update, and the complexity of the case in general, we would expect that it would take fifteen business days to prepare and file interrogatories from the time the update was received. That would make the reasonable date April 7th. However, we are very cognizant of the scheduling difficulties faced by the Board (and all parties) in the next few months, and so we believe that it is more realistic to extend the current



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March 24th IR deadline to March 31st. With an extension of that length, we believe that it would be possible to go back over the newly filed evidence, revise interrogatories that are now out of date, and file an updated set by that date. We therefore request that the Board order a one week extension to the deadline for submitting interrogatories.

We have read the letters from several other parties, and in general we concur with the concerns they have expressed, and their recommended resolution, which is consistent with our proposal above.

We thank the Board for its consideration.

Yours very truly, SHIBLEY RIGHTON LLP

Jay Shepherd

Cc: Interested parties (by email)