

July 17, 2013

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

Re: Entegrus Powerlines 2014 IRM Tranche Considerations (EB-2013-0120)

Dear Ms. Walli,

Entegrus Powerlines Inc. ("Entegrus"), formerly known as Chatham-Kent Hydro Inc. ("CKH"), is a local electricity distribution company ("LDC") serving 16 Ontario communities. Entegrus distribution rates are segregated into four separate rate zones: (i) Chatham-Kent ("CK"), (ii) Strathroy, Mount Brydges and Parkhill ("SMP"), (iii) Dutton and (iv) Newbury. The latter three rate zones previously formed Middlesex Power Distribution Corporation ("MPDC"), which was amalgamated with CKH on January 1, 2012. The combined company was subsequently renamed as Entegrus.

For Incentive Rate Mechanism ("IRM") rate application purposes, the CKH application has been traditionally assigned to an early deadline tranche. On July 6, 2012, Entegrus outlined via a letter to the Board, circumstances that make it challenging for Entegrus to meet the Tranche 1 deadline for all four rate zones.

For the 2014 IRM application process, Entegrus again respectfully requests consideration with regard to later application timing. Entegrus notes that the following application elements are anticipated for the 2014 IRM applications:

CK Rate Zone

- LRAM persistence of 2011 and 2012 CDM programs in 2012
- LRAM Variance Account Disposition for 2012

SMP Rate Zone

- LRAM persistence of 2010 and 2011 CDM programs in 2010, 2011 and 2012
- LRAM Variance Account Disposition for 2012

Dutton & Newbury Rate Zones

- Standard elements

In order to allow sufficient time to prepare its four separate Applications by rate zone, Entegrus respectfully requests that it be assigned to the Tranche 2 deadline or later (i.e. Tranche 3, 4, 5 or 6).

If you have any questions or concerns regarding this submission, please do not hesitate to contact me at (519) 352-6300 ext. 266 or via email at: regulatory@entegrus.com.

Regards,

[Original Signed By]

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cc: Stephen Vetsis, Board Staff
Dan Charron, President
Chris Cowell, Chief Financial and Regulatory Officer
David Ferguson, Director of Regulatory & Administration