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March 10, 2016

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

Dear Ms. Walli:

## <u>Re: Cornwall Street Railway Light and Power Company Limited ("Cornwall Electric")</u> <u>Electricity Distribution Licence ED-2004-0405</u>

On behalf of Cornwall Electric, we are writing to request that its Electricity Distribution Licence ED-2004-0405 (the "Licence") be extended from December 31, 2019 to December 31, 2030.

Cornwall Electric is not connected to the IESO-controlled grid. Rather, it is connected to Hydro Quebec's transmission system and is supplied power by Hydro Quebec pursuant to two power purchase agreements (the "PPAs"). The PPAs also expire on December 31, 2019 and are expressly referenced in the Licence at Schedule 2.

Cornwall Electric has recently entered into discussions with Hydro Quebec Energy Marketing ("HQEM"), a subsidiary of Hydro Quebec, to extend the PPAs to December 31, 2030. These discussions are occurring now, approximately four years prior to the expiration of the PPAs, for the following two reasons:

1. CE does not want to risk entering into a long-term PPA with HQEM if there is a possibility that its Licence will not be extended over the term of a new PPA. The longer CE waits to enter into a new PPA with HQEM, the weaker its bargaining position will be. The reason for this is that CE's power alternatives will diminish as December 31, 2019 approaches, resulting in CE becoming more beholden to HQEM. Therefore, CE wants to extend its License now while negotiating a new long-term PPA with HQEM to secure the lowest possible cost of power for its customers, while minimizing its own risk.

2. In the event that the Licence is not extended or negotiations with HQEM fail, CE will have to build new facilities to connect to the IESO-controlled grid. This could take three to four years.

Cornwall Electric wishes to continue its arrangement with Hydro Quebec through HQEM (i.e. the status quo), whereby CE's customers enjoy a low cost of power. Therefore, CE requests that its Licence be extended now (until December 31, 2030) in order to facilitate CE's negotiations with HQEM.

Thank you in advance for your consideration.

Sincerely,

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Andrew Taylor