



Your Home Town Utility



July 10th, 2018

Ms. Kirsten Walli,
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Walli,

RE: Application under section 86 of the *OEB Act, 1998* to amalgamate WCHEI and ETPL
Board File No: EB-2018-0082
Amendment to Board Staff IR#3(a)

On behalf of the Applicants, we submit this letter amending the Applicants' responses to Board Staff interrogatories (IRs) submitted on June 18, 2018. In particular, the Applicant's response to Board Staff IR#3(a) is amended to include a reference to Section 86(2)(a) of the OEB Act, which correctly reflects the Board's amending letter dated June 13th. The amendment is set out in the redlined version below:

Response - Board Staff IR#3(a)

In their Application, the Applicants only requested approval of the amalgamation of the LDCs pursuant to section 86(1)(c) of the *OEB Act*, and not the first step involving the issuance of ERTH Corporation shares to the Town of Goderich (as a means to immediately effect a short-form amalgamation of the ETPL and WCHEI.) The Applicants' rationale for not seeking relief under section 86(2)(~~ab~~) of the *OEB Act* was that the first step (i.e. issuance of ERTH Corporation shares to the Town of Goderich) was meant to occur simultaneously with the second step (i.e. the amalgamation of ETPL and WCHEI).

However, upon receipt of Board Staff IR#3, the Applicants have recognized that they should be asking for relief under section 86(2)(~~ab~~) of the *OEB Act* for the first step, and the Applicants' respectfully ask that the Application be amended accordingly. For greater

certainty, the Applicants are also seeking the OEB's approval of the acquisition by ERTH Corporation of all of the shares of WCHEI pursuant to section 86(2)(ab) of the OEB Act.

The above amendment, which is located on p.10 of 40 of the Applicant's responses to Board Staff IRs, is the only change to the Applicants' responses.

Should you have any questions, or concerns, please contact myself at Erie Thames Powerlines Corporation at 519-485-1820 ext. 254, or via email at gpettit@erithamespower.com.

Respectfully,

A handwritten signature in black ink, appearing to read 'Graig Pettit', with a stylized flourish at the end.

Graig Pettit
Vice President and General Manager
Erie Thames Powerlines Corporation