

September 17, 2018

VIA COURIER & RESS FILING

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

Dear Ms. Walli:

**Re: Energy+ Inc. (“Energy+”) 2019 Cost of Service Application;
Board File No.: EB-2018-0028**

We are writing on behalf of Toyota Motor Manufacturing Canada Inc. (“**TMMC**”) and in accordance with Procedural Order No. 1 to advise the Board that TMMC intends to file evidence in the above-noted proceeding, as follows:

- Written Evidence of Jeffrey C. Pollock, J. Pollock Incorporated; and
- Written Evidence of Melody Collis, TMMC.

The evidence of Mr. Pollock, an independent expert in the areas of electric utility cost allocation and rate design, will address Energy+ Inc.’s (“**Energy+**”) proposal for a Standby Rate, applicable to customers with load displacement generation, such as TMMC. In this regard, Mr. Pollock’s evidence will consider Energy+’s Class Cost-of-Service Study and its Large Use Class and Standby Rate designs. Ms. Collis’s evidence will provide contextual information and data about the development and operation of TMMC’s load displacement facility.

Procedural Order No. 1 requires that intervenors who intend to file evidence do so by September 24, 2018. On Friday, September 14, 2018, Energy+ filed its responses to interrogatories received from Board Staff and Intervenors, including TMMC. In response to 1-Staff-2, Energy+ states that it has updated its models to reflect changes that it proposes to make to its application as a result of responding to various interrogatories. One such change is to update for 2017 actual data which, in turn, affects assumptions supporting Energy+’s proposed Standby Rate.

TMMC has reviewed the above-noted changes and, earlier today, requested that Energy+ provide the revised cost allocation model (which was not included in the responses), as well as certain related work forms, schedules and other documents underpinning the changes that have been made. TMMC has now

received the revised cost allocation model and Energy+ has advised that it is working diligently to provide the other underpinning documents and deliver them to us by Tuesday or Wednesday of this week. Upon receipt of the new documents, Ms. Collis and Mr. Pollock will each consider what changes are required to be made to their respective written evidence.

In light of the above, TMMC will not be able to file its written evidence by the September 24th deadline. At this point and until we have seen the information that is to be provided by Energy+ later this week, we are uncertain as to how much additional time will be required. We are committed to working diligently and in cooperation with Energy+ to avoid undue delays in the Board's procedural schedule. We will advise the Board as soon as possible and, in any case, no later than Friday, September 21, 2018, as to what extension of time may be required.

Yours very truly,

Dentons Canada LLP

(signed) Helen T. Newland

Helen T. Newland

HTN/ko

cc: Melody Collis, TMMC
Bill Fantin, TMMC
Pete Leonard, TMMC
Jo Keaton, TMNA
John Vellone
Parties to EB-2018-0028