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February 13, 2019

Via Courier and Email

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

Re: 2020 Cost of Service Application Deferral Request

Dear Ms. Walli:

On November 27, 2018, the Ontario Energy Board ("OEB") issued a letter identifying those electricity distributors that are scheduled to file a cost of service application for 2020 rates. Niagara Peninsula Energy Inc.'s ("NPEI's") rates were last set on a cost of service basis for rates effective June 1, 2015 (EB-2014-0096). NPEI is currently included on the OEB's 2020 rebasing list for rates effective May 1, 2020.

In its letter, the OEB advised that distributors whose current rate year commences on May 1 that plan on requesting a change to a January 1 rate year should notify the OEB of this intent no later than March 1, 2019. The letter also indicates that any distributor that has been included on the 2020 rebasing list but wishes to defer rebasing beyond the 2020 rate year must advise the OEB by March 1, 2019.

NPEI hereby requests approval to defer its cost of service rate application for 8 months, such that NPEI would file a cost of service rate application for rates effective January 1, 2021. The reason for this request is to align NPEI's rate year with its fiscal year and Reporting and Record Keeping Requirements ("RRR") reporting year. NPEI will be able to manage its resources and financial needs within the revenue under the 4th Generation Price Cap Adjustment and maintain an adequate ROE and customer service.

Should you have any questions regarding this matter, please contact the undersigned.

Yours truly, NIAGARA PENINSULA ENERGY INC.

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