

67 Yonge Street
Suite 1040
Toronto ON, M5E 1J8



APPRO

ASSOCIATION OF
POWER PRODUCERS
OF ONTARIO

March 12, 2019

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

**Re: Rate Design for Electricity Commercial and Industrial Customers
Board File No. EB-2015-0043**

Dear Ms Walli,

Further to the Board letter dated February 21, 2019 and APPRO's letter of February 25 on cost eligibility, we are writing to request an extension of the deadline for comments on the staff report.

Based on a preliminary review of the staff report and the related research, it has become apparent to us that the current proposals for rate design have complex implications for other aspects of the energy industry, and potentially long term impacts on the system. A proper summation of issues will likely take more than the four weeks currently anticipated, particularly considering the likelihood that we will need to confer with other stakeholders in the process.

As we heard during the Stakeholder Forum on March 7, many participants feel that circumstances have changed significantly during the last 2 years since our previous submission was prepared. As a result, we anticipate a need to begin with an update of our previous analysis, which will add to the time required.

In addition, the March break has affected the availability of stakeholders and experts, further extending the time required to prepare a conscientious response.

For these reasons, we would suggest an additional 3 to 4 weeks for preparation of comments on the staff report.

We appreciate your consideration of our request and look forward to your reply.

Respectfully,

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

Jake Brooks
Executive Director

cc: Laurie Reid
Dave Butters