

# MICHAEL R. BUONAGURO

Barrister and Solicitor

24 HUMBER TRAIL  
TORONTO, ONTARIO, M6S 4C1  
P: (416) 767-1666  
F: (416) 767-1666  
EMAIL: [mrb@mrb-law.com](mailto:mrb@mrb-law.com)

---

March 13, 2019

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
26<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON  
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Walli,

**Re: Chapleau Public Utilities Corporation (Chapleau Public Utilities)**  
**Application for rates**  
**Ontario Energy Board File Number: EB-2018-0087**

I am writing in my capacity as counsel for Chapleau Public Utilities in the above noted proceeding to respectfully request an extension of time for the applicant to respond to the interrogatories filed by Board Staff and VECC. We ask that the current (differing) deadlines for the filing of responses to the interrogatories of Board Staff and VECC be extended by two weeks from the current deadline for responses to Board Staff interrogatories, which would result in a new, global deadline of April 4, 2019.

We make this request as a result of several factors.

First, the period for responding to interrogatories runs through March Break, which results in the periodic unavailability of some of the members of the team Chapleau Public Utilities relies on in order to complete various of the responses. Had the applicant been consulted with respect to the scheduling of the procedural steps in this proceeding we would have noted the reduced resources during the March Break week when suggesting a suitable timetable.

Second, the period for answering interrogatories coincides with Chapleau Public Utilities' fiscal year-end, such that the applicant is, at the same time it is working with its auditors to close its' fiscal year, trying to use the same resources to answer interrogatories.

Third, Chapleau Public Utilities' already small staff complement has been further

depleted as a result of an injury to one of its staff, further reducing the resources available to the company during this period.

Lastly, Chapleau Public Utilities has received 168 interrogatories spread out over 100 pages from Board Staff alone. Having reviewed the extensive number of interrogatories, the applicant has concluded that, as one of the smallest regulated utilities in the province it simply cannot respond to the sheer volume of questions put to it by Board Staff (let alone the additional interrogatories submitted by VECC) within the current timelines, particularly in conjunction with the other challenges that have been noted.

For all these reasons we respectfully request the deadline for the filing of responses to interrogatories by the applicant be extended to April 4, 2019.

Yours very truly,



Michael R. Buonaguro

CC: All Participants