

**Daliana Coban**  
Director, Regulatory Applications  
and Business Support  
Toronto Hydro-Electric System Limited  
14 Carlton Street  
Toronto, ON M5B 1K5

Telephone: 416.542.2627  
Facsimile: 416.542.3024  
[regulatoryaffairs@torontohydro.com](mailto:regulatoryaffairs@torontohydro.com)  
[www.torontohydro.com](http://www.torontohydro.com)



August 23, 2019

Via RESS

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

Dear Ms. Walli:

**Re: EB File No. EB-2018-0165, Toronto Hydro-Electric System Limited ("Toronto Hydro")  
Custom Incentive Rate-setting ("Custom IR") Application for 2020-2024 Electricity Distribution  
Rates and Charges – Reply to Intervenor's Requests for Extensions to the Argument Filing  
Deadline**

---

Toronto Hydro has reviewed the requests submitted by DRC, CCC, PWU, VECC, AMPCO and Mr. Hann (collectively, the Intervenor), and understands that they are requesting an additional four business days beyond the Ontario Energy Board's (the Board) deadline of August 26 for filing their argument as set in Procedural Order No. 4, which was issued on February 27, 2019.

### **Toronto Hydro's Request**

While Toronto Hydro seeks to be cooperative in assisting the Intervenor to manage their workloads, for the reasons set out below, Toronto Hydro respectfully proposes a more limited extension of two business days for filing of intervenor argument, provided that Toronto Hydro is granted a consequential extension of one business day to file its reply argument.

### **Toronto Hydro's Rationale for Its Request**

Toronto Hydro has met all timelines set out by the Board in this proceeding, including filing its Argument in Chief on August 2, just over two weeks after the Oral Hearing was completed. Toronto Hydro also notes that Board Staff met the August 21 deadline for submission of final argument.

By way of Procedural Order No. 4, the Board provided Toronto Hydro 14 business days to file its Reply Argument following submission of intervenor arguments. Toronto Hydro requires all of these days in order to adequately reply to 11 arguments. This means that in order to accommodate a four day extension for the Intervenor, Toronto Hydro would require a corresponding four day extension to file its reply. However, a four day extension to the reply argument period is not practicable. Toronto Hydro has prioritized and built staffing schedules and its other work plans around the timelines for this application, including filing its Reply Argument on September 13. Beginning the week of September 16, Toronto Hydro staff have various personal and professional commitments that prevent them from being able to continue work on Reply Argument. These include: travel plans, medical appointments, lack of availability of childcare, external counsel unavailability, and other professional requirements.

In light of the foregoing, Toronto Hydro respectfully requests that the Board limit the extension of the deadline for intervenor argument to two days, such that intervenors' submissions would be due August 28. Toronto Hydro also proposes a one day extension for the Applicant to file its Reply Argument, such that it would be due September 16. While this will require Toronto Hydro to dedicate additional weekend time to working on its Reply Argument, it is prepared to do in order to be helpful.

Please contact me directly if you have any questions or concerns.

Respectfully,



**Daliana Coban**

Director, Regulatory Applications and Business Support  
Toronto Hydro-Electric System Limited

cc: Lawrie Gluck, OEB Case Manager  
Michael Miller, OEB Counsel  
Parties of Record  
Amanda Klein, Toronto Hydro  
Andrew Sasso, Toronto Hydro  
Charles Keizer, Torys LLP