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September 6, 2019

Sent by Electronic Mail, Courier & RESS Electronic Filing

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

Dear Ms. Walli:

RE: EB-2018-0336: EPCOR Natural Gas Limited Partnership (EPCOR) Application for 2020-2024 Rates, Phase 2 – Extension Request to File Reply Submission

Pursuant to the Decision and Interim Rate Order dated July 4, 2019 (the "Order"), EPCOR's deadline for filing a reply argument and serving it on all intervenors is September 9, 2019. EPCOR is requesting an extension to file its reply argument by no later than September 20, 2019.

The basis for this extension request is threefold:

1. EPCOR currently has a number of matters before the Board that are staffed by the same individuals, some of whom have and are taking previously scheduled time off this month. These resourcing issues have impacted EPCOR's ability to meet the reply submission filing deadline as set out in the Order;
2. This extension request would not prejudice the parties involved in this proceeding; and
3. This extension request would not result in a significant or unreasonable delay with respect to the final determination of the deferred issue in Phase 2. The reply argument is the final step of the Phase 2 process and we anticipate that this proceeding can still be finalized well in advance of when the approved (interim) rate order and accounting orders come into effect, on January 1, 2020.

We submit that this extension request is reasonable in light of the above-noted circumstances and that the additional time will allow EPCOR to reply in a meaningful way to the submissions of OEB staff and VECC.

Thank you for your consideration. Please do not hesitate to contact me if you have any questions.

Yours truly,

Original Signed By:

Daniela O'Callaghan

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cc: All parties to EB-2018-0336