

October 7, 2019

VIA RESS AND COURIER

Ms. Kirsten Walli
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Dear Ms. Walli:

Re: EB-2018-0264 – EPCOR Natural Gas Limited Partnership (EPCOR) Southern Bruce Rate Application.

Industrial Gas Users Association (IGUA) Request for Extension of Time for Argument.

We write further to Procedural Order No. 6 herein, issued October 3rd. Through that Procedural Order the Board directed parties to proceed to written argument, with intervenors to file arguments by October 11th, which is 6 working days after issuance of the Procedural Order and 5 working days from today (including today).

It is respectfully submitted that this is too short a time for us to properly draft argument, have it reviewed by IGUA and its two directly affected constituents (EPCOR's 2 proposed Rate 16 customers), incorporate their feedback and finalize argument for filing. This is particularly so in this instance where EPCOR has applied to set "greenfield" rates for 10 years, and considering in particular the novelty of EPCOR's proposal to establish those rates using a unique and non-traditional approach, in the admittedly unique circumstances of this application.

Further, the Jewish holiday of Yom Kippur falls this Tuesday evening and runs through Wednesday, effectively removing for IGUA 1.5 days from the 6 day time frame provided for in Procedural Order No. 6.

Considering all of the foregoing, we write to request that the Board extend the schedule for argument.

Considering that October 14th is the Thanksgiving statutory holiday, we request extension of the date by which intervenors are to file argument to Friday October 18th. Accounting for the intervening Jewish and Thanksgiving holidays this extension would effectively provide us with an additional 2.5 working days (relative to the schedule set by the Board).

Should this request be granted, it would also be appropriate for the Board to extend the date for EPCOR to file its reply argument from October 21st to October 24th.

We would appreciate the Board's consideration of this request.

Yours truly,


Ian A. Mondrow

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