

November 7, 2019

VIA RESS AND COURIER

Ms. Christine E. Long
Registrar and Board Secretary
ONTARIO ENERGY BOARD
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Dear Ms. Long:

**Re: EB-2019-0242: Association of Major Power Consumers in Ontario (AMPCO)
Application for Review of an Amendment to the Independent Electricity System
Operator (IESO) Market Rules.**

AMPCO Reply Submissions on Motion for Stay: Request for Extension.

Pursuant to Procedural Order No. 3 we have received 4 submissions on AMPCO's Motion for a Stay of the Market Rule amendments in issue in this matter. Kingston CoGen, APPRo and Board Staff each filed detailed submissions on November 1st. The IESO filed its detailed submission two days ago, on November 5th, one week after AMPCO's motion submissions were filed. In addition, also pursuant to Procedural Order No. 3, yesterday we filed AMPCO's responses to interrogatories posed by the IESO and SEC.

AMPCO intends to file a reply submission on the motion as has been permitted by P.O. No. 3, which reply submission is currently due no later than November 8th (tomorrow). We write to request a 1 business day extension within which to file these reply submissions.

AMPCO appreciates that its motion for a stay of the impugned Market Rule amendments is a matter of some urgency, in particular in light of the scheduled December 4th capacity auction enabled by the subject amendments. While AMPCO's reply submission is the last procedural step in the motion process, AMPCO further appreciates that the Hearing Panel then has to then carefully and fully deliberate all of these submissions and come to a timely determination on a matter of some import and complexity.

We nonetheless make this request for a brief extension with the conviction that it is necessary, in the circumstances of the challenging schedule in this matter (we have had the IESO's detailed submissions for 2 days, including today), to allow us to properly finalize with AMPCO a full, clear and

cogent response to the submissions received and thus properly serve the interests of AMPCO's members and best assist the Board in its deliberations.

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

Yours truly,


Ian A. Mondrow

cc: Glenn Zacher, Counsel for IESO
James Hunter, IESO
Colin Anderson, President, AMPCO
Michael Bell (OEB Staff)
Ljuba Djurdjevic (OEB Staff)
Intervenors of Record

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