

March 26, 2021 By Email

Ms. Christine E. Long, Registrar Ontario Energy Board P.O. Box 2319 2300 Yonge Street, 27th Floor Toronto, ON M4P 1E4

Dear Ms. Long,

Re: Distribution System Code Section 5.1.3 (b) – MIST Meter Installation Requirements
ENWIN Utilities Ltd. Application for Temporary Extension

On July 23, 2020, the Ontario Energy Board ("OEB") issued its EB-2020-0187 Decision and Order ("Decision"). This Decision amended the Licenses of electricity distributors to provide a temporary exemption from Section 5.1.3 (b) of the Distribution System Code ("DSC"), extending the date to install a "Metering Inside the Settlement Timeframe" ("MIST") meter on any existing installation that has a monthly average peak demand during a calendar year of over 50 kW (a "GS>50 kW customer") from August 21, 2020 to March 31, 2021.

In the Decision, the OEB acknowledged that operational challenges due to the COVID-19 emergency may have caused delays in distributors meeting the original August 21, 2020 date, in particular, potential delays in accessing customers' locations due to the pandemic and emergency declaration, and the impact on distributors' resources involved in meter installations and integrating these new meters into billing systems. The OEB noted that any distributor that required an extension beyond March 31, 2021 would need to make a separate application requesting such relief.

ENWIN Utilities Ltd. ("ENWIN") has been actively working towards replacing all existing meters with MIST meters where required, despite the ongoing challenges the pandemic has created. These challenges include safely gaining access to customers' premises to complete the meter exchanges, and ensuring that customer outages and disruptions are limited to the extent possible, acknowledging the impact the pandemic has already had on many customers. ENWIN has also ensured staffing resources have been made available to devote to this initiative, although during the initial wave of the pandemic in spring 2020, discretionary MIST meter exchange work was temporarily halted for a period of approximately one month.

Despite the above, as of the date of this Application, the required MIST meter exchanges have been completed for all but one (1) of ENWIN's more than 1,000 active

accounts classified as GS>50 kW. This particular outstanding account requires the customer to complete repairs in order to safely complete the meter exchange. ENWIN has had ongoing dialogue with the customer and has recently been made aware that there is potential the required work may not be completed in time for the March 31, 2021 DSC deadline to be met.

Therefore, in consideration of the above, ENWIN is hereby requesting an additional one-month temporary extension to the requirements of Section 5.1.3 (b) of the DSC until April 30, 2021, in order to allow additional time, if required, for it to complete installation of the remaining required MIST meter, pending completion of the required work by the customer. ENWIN is willing to inform the OEB in writing once the remaining MIST meter exchange has been completed.

Pursuant to section 6(4) of the *Ontario Energy Board Act, 1998*, ENWIN requests this relief be determined without a hearing. ENWIN submits the requested relief is relatively modest, and is primarily caused by reasons that are outside of its control. The requested relief would only be in relation to one customer, while in the interim, the customer would continue to receive service and be billed using their existing meter as they have historically, resulting in limited to no harm or disruption of service to the customer. This extension would ultimately allow additional time, if necessary, for the required work to be completed and facilitate the meter exchange occurring in a safe manner.

To the extent a Decision on this Application cannot be granted prior to March 31, 2021, ENWIN respectfully requests that an interim extension be granted.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,

ENWIN Utilities Ltd.

M/A/-

Matt Carlini

Vice President Corporate Services & CFO