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January 26, 2021

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

Re: Expression of Interest to Defer Rebasing

Dear Ms. Long:

Northern Ontario Wires Inc. respectfully requests an adjustment for rebasing rates from May 1, 2022 to May 1, 2025.

This request is based on the following information:

- a) Northern Ontario Wires Inc. has performed within the ROE dead band since the last Cost of Service and is expected to continue this performance for the next few years. This is, of course, assuming that COVID-19 does not significantly impact operations for an extended period of time.
- b) With the uncertainty of COVID-19 and the rapidly changing regulatory requirements, NOW Inc. does not have the internal staff levels to successfully complete a Cost of Service Application for 2022 rates.
- c) From a regulatory and financial standpoint, as NOW Inc. is within its targets and the cost of an application being significant, a deferral to 2025 would be more cost efficient for our customers.
- d) NOW Inc. is contemplating an ICM, which may not come to fruition, even with a deferral to rebasing for 2025 rates.

NOW Inc. is in the early stages of a station replacement project, which will be underway in 2021. The capital plan outlined in our last COS is still relevant, and rebasing earlier than 2025, in our opinion, is not financially prudent. This project which was identified in the last DSP filed with the 2017 COS Rate application can be addressed in an ICM application. Some labour for this rebuild will be with NOW staff, which was accounted for in the Capital plan submitted in the 2017 COS. As such, the incremental cost above the approved capital addition is not significant enough to warrant a standalone Cost of Service application. The Cost/Benefit of an ICM with an updated DSP would be preferred due to the factors noted above.

Your consideration in this matter is greatly appreciated.

Yours truly,

A handwritten signature in blue ink, appearing to read "Geoffrey Sutton".

Geoffrey Sutton, CPA, CA
Chief Financial Officer
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Email: geoffs@nowinc.ca