

April 7, 2025

**VIA RESS**

Ms. Nancy Marconi  
Registrar  
**ONTARIO ENERGY BOARD**  
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Dear Ms. Marconi:

**Re: EB-2024-0063 – 2024 Review of Cost of Capital Parameters and Deemed Capital Structure.**

**Request for Extension of Time Within Which to File Cost Claims for Industrial Gas Users Association (IGUA) and Association of Major Power Consumers in Ontario (AMPCO).**

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We write to request an extension of time within which to file cost claims in this matter for IGUA and AMPCO. We should be able to file cost claims for both of these parties by Thursday April 10<sup>th</sup>.

The reasons for this request are:

1. I am working with a new support person who has little experience with cost claim compilation and filing. I anticipate that finalization of comprehensive claims in this matter (see next point) will require some additional iteration to ensure completeness and accuracy.
2. As the Board is aware, the participation of IGUA and AMPCO in this matter was extensive, resulting in a large number of time entries to collect, review, categorize and tabulate into the Board's prescribed cost claim forms. The addition of time for the expert sponsored by IGUA and AMPCO will require additional review and tabulation. As noted in the first point noted above, I will have to carefully review and verify all of this work prior to submission.
3. The task of compiling and submitted these cost claims is ours, not that of our clients. Without a brief extension our clients could be prejudiced, through no fault of their own. Given their extensive commitment to this process and to supporting a fair and informed outcome thereto, we submit that such prejudice should be avoided if it can reasonably be without undue prejudice to other parties or disruption to the Board.
4. The time specified for filing these cost claims - 9 business days following issuance of the decision – was relatively tight to begin with. This is not a complaint, but it has affected our ability to file full

cost claims today, and, we submit, is a legitimate factor in considering the reasonableness of this request.

5. We are simultaneously preparing a cost claim for IGUA which is due tomorrow in matter EB-2024-0200 (Enbridge Gas Inc.'s St. Laurent Pipeline Leave to Construct application). With the granting of an extension to file cost claims in this Cost of Capital matter, we will be able to file that other cost claim on time.

If our request is granted, any rate-regulated companies seeking to object to the claims by IGUA and AMPCO will still have 5 business days to review the claims and file any objections. Should any of these rate-regulated companies require additional time to review the claims and consider objections, we can certainly agree to receive those as late as April 23<sup>rd</sup>, and would still respond to any such objections by the current deadline for such responses of April 28<sup>th</sup>.

We apologize for having to seek this indulgence, but would appreciate the Board's consideration and advice.

Yours truly,



Ian A. Mondrow

c: J. Irving (IGUA)  
B. Duguid (AMPCO)  
Michael Millar (OEB Counsel)

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