



BY EMAIL and RESS

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November 10, 2017
Our File No. EB-2017-0024

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2017-0024 – Alectra Utilities – Oral Hearing

We are counsel for the School Energy Coalition. Pursuant to Revised Procedural Order #1, these are SEC's submissions with respect to the procedure for hearing the issues in this case.

Incremental Capital Module. SEC agrees with OEB Staff that the issues relating to the ICM would benefit from oral evidence and cross-examination on that evidence. That includes not just the need, nature and cost of the proposed projects. It also includes the related issue of the Enersource DSP (which underlies the Enersource ICM), and questions such as efficiencies and priorities as between the various rate zones.

Change in Capitalization Policy. SEC also agrees with OEB Staff that the capitalization policy change would benefit from oral evidence and cross-examination. The Board will be aware that, in SEC's November 3rd letter on the Issues List, we have discussed in some detail the various sub-issues underlying the capitalization question. For example, if the Board is to consider whether it is a Z-factor, then evidence on the various Z-factor criteria may have to be adduced.

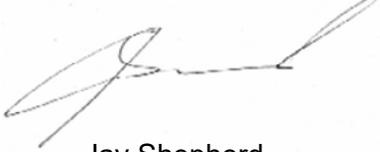
Street-Lighting Cost Allocation. SEC agrees with the City of Hamilton that, if the Board determines that the street-lighting cost allocation issue is properly to be considered in this proceeding, that would probably benefit from being included in the oral hearing.

Technical Conference. SEC notes that it may be possible to shorten the oral hearing by having a technical conference first. That way many of the more detailed questions, particularly

with respect to capital, could be addressed and the oral hearing could be more focused. However, we also realize that the amount of time and resources saved may be limited, and it may be simpler just to have all of those questions asked during the oral hearing. The oral hearing may be slightly longer, but an extra day scheduled for a technical conference could be avoided.

All of which is respectfully submitted.

Yours very truly,
JAY SHEPHERD P. C.



Jay Shepherd

cc: Wayne McNally, SEC (email)
Interested Parties