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BY EMAIL and RESS

November 25, 2011
Our File No. 20110328

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2011-0328/9 – Chatham-Kent Middleses=x Amalgamation

We are counsel for the School Energy Coalition. Pursuant to Procedural Order #1 in this proceeding, this letter constitutes SEC's submissions with respect to the Applications.

In our submission, the Applications should be approved as filed.

SEC has often expressed its strong support for efforts of utilities such as CKH to further consolidation of the electricity distribution sector, particularly by mergers with smaller utilities whose customers can benefit from the operational and administrative infrastructure provided by a larger partner.

In this particular case, the benefit is enhanced by the fact that CKH is a utility that has provided safe and reliable electricity distribution at a reasonable cost. In a comparison of the 2011 distribution bills for all classes for the 26 LDCs with 30,000 customers or more (filed in EB-2011-0144), CKH ranks 12th, just below the average of the group. The deferral of rebasing until 2016 gives customers in their franchise areas the expectation that their rates will continue to be at reasonable levels for another several years.



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We therefore support the Application.

All of which is respectfully submitted.

Yours very truly,

JAY SHEPHERD P. C.

Jay Shepherd

cc: Wayne McNally, SEC (email)
Judith Fernandes, OEB (email)
Interested Parties