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BY EMAIL and RESS

April 27, 2012
Our File No. 20110354

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2011-0354 – Enbridge 2013 Rates - Preliminary Issue

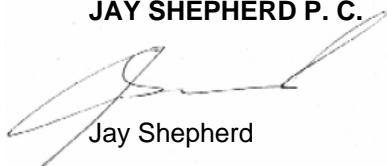
We are counsel for the School Energy Coalition. Pursuant to Procedural Order #1, this letter constitutes SEC's submissions with respect to the preliminary issue.

We have reviewed the thorough submissions of Board Staff on this question, and in general agree with their conclusion and reasoning. We particularly note the value arising from the fact that USGAAP will give the Board the continued ability to compare results between Union and Enbridge, something that has been useful in the past.

We have limited these submissions to the specific question contained in PO #1. The Board will aware from EB-2011-0277 that SEC is concerned that the \$90 million OPEB figure may be overstated, and that the need for, and proposed scope of, the 2013 TIACDA are not clear. However, since these issues have not been included in the question put by the Board, we have deferred our input on those until the appropriate time.

All of which is respectfully submitted.

Yours very truly,
JAY SHEPHERD P. C.



Jay Shepherd

cc: Wayne McNally, SEC (email)

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