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BY EMAIL and RESS

April 19, 2013
Our File No. 20120055

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

Dear Ms. Walli:

Re: EB-2012-0055 – Enbridge 2011 Deferral and Variance Accounts

We are counsel for the School Energy Coalition. We are in receipt of Enbridge's Reply Submissions on the DRO in this matter, and wished to make clear that one of the comments in those submissions is incorrect.

In those submissions, Enbridge takes the position that, because SEC did not file comments on the DRO, we should be taken to agree with it in its entirety.

This took us a little by surprise. It is common practice, where there are a number of intervenors, for only some intervenors to comment on the DRO. Other intervenors, knowing that those who are commenting will capture all of the material issues, make no additional comments, in the interests of regulatory efficiency. SEC is sometimes the one on whom others rely, and sometimes we rely on other parties. In this case, we relied primarily on CME, because we knew they would be thorough in their analysis, and their interests on this point are similar to those of SEC. We were also aware that Energy Probe would be providing comments.

It would not, we believe, be in the interests of the Board and its processes if parties felt they all had to provide comments on every step, every issue, every debate. It is much better for intervenors to work together, and rely on each other when separate submissions will not be of



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value to the Board. This is the practice today, and it would be unfortunate if utilities were to twist that in a manner that makes it impossible to continue with that practice.

That having been said, in case Enbridge or the Board are in any doubt, SEC supports the submissions of CME on the DRO.

All of which is respectfully submitted.

Yours very truly,

JAY SHEPHERD P. C.

Jay Shepherd

cc: Wayne McNally, SEC (email)
Interested Parties