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BY EMAIL and RESS

November 22, 2013
Our File No. 20130196

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2013-0187/196/198 – Hydro One Norfolk MAADs

We are counsel for the School Energy Coalition. Further to PO #6 in this matter, these are SEC's reply submissions with respect to the need for further interrogatories or other discovery.

SEC reiterates our initial submissions on this issue. Nothing in the submissions of others has suggested to us that our submissions need to be changed.

In our view, once the Board hears the SEC Motion, and makes its determination on each of the IR responses in issue, the key issues in dispute associated with the scope of the proceeding will be much clearer to all parties. For that reason, we are not overly concerned that there will be additional refusals after that point in time. While there may well be additional claims of confidentiality, we would expect that the Applicants, and the intervenors, will be guided by the Board's decision on the motion, and the proceeding will flow smoothly.



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This does not change our view that these key issues will require cross-examination in an open hearing before the Board can make its final decision on the Application. However, obviously if the Board takes the very narrow view of the no harm test being put forward by Hydro One, in which future rates are irrelevant, and the rational consolidation of the sector is irrelevant, SEC may have to re-evaluate that opinion.

All of which is respectfully submitted.

Yours very truly,
JAY SHEPHERD P. C.



Jay Shepherd

cc: Wayne McNally, SEC (email)
Interested Parties