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BY EMAIL and RESS

February 28, 2014
Our File No. EB20130321

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2013-0321 – OPG Payment Amounts – SEC Interrogatories

We are counsel for the School Energy Coalition. We are writing this letter to request an extension for filing our interrogatories in this matter until Monday, March 3, 2014.

The SEC intervention in this matter is comprised of Mark Rubenstein, Mark Garner, and Jay Shepherd. The team has divided up responsibility for areas of the Application, and has been working diligently to prepare interrogatories that will be useful to the Board. Those interrogatories are more than 90% completed, but we assess that the process of bringing them together into one document, checking them for duplication with Staff interrogatories, and doing a final review of materiality and usefulness, cannot be completed before the end of day today. We thought that would be possible, but it now does not appear to be the case.

The Board will be aware that this is a particularly busy time in Board proceedings. Mr. Shepherd is taking an active role in the oral hearing on the Enbridge 2014-2018 application, a heavy time commitment that started some weeks ago. He is also lead counsel for SEC on the Orangeville and Cambridge applications, and involved in several other OEB matters. Mr. Rubenstein is lead counsel in several electricity distribution applications, some of which have ADRs this week and next, including considerable time adjusting (as with all parties) to the new



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generic issues list. Mr. Garner has a key role in interventions for VECC for several electricity distributors.

Despite this, SEC expected that we would be able to meet today's interrogatory deadline. We have been unable to do so, despite our best efforts, and therefore request an extension of one business day to file those interrogatories.

All of which is respectfully submitted.

Yours very truly,

JAY SHEPHERD P. C.

Jay Shepherd

cc: Wayne McNally, SEC (email)
Interested Parties