

**Jay Shepherd** 

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## **BY EMAIL and RESS**

December 10, 2015 Our File: EB20150079

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

## Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

## Re: EB-2015-0079 – Hydro One Dx 2016 – SEC Submission

We are counsel to the School Energy Coalition ("SEC"). SEC has reviewed the Draft Rate Order provided by Hydro One Networks Inc. and has no concerns as it correctly reflects the implementation of the Board's decision in EB-2013-0416.

SEC does wish to comment that insofar as any other party requests that the Board take further steps to eliminate the seasonal rate class in <u>this</u> proceeding, it should be denied. The elimination of the season rate class, in whole or in part, will have an effect on other rate classes, including those that contain non-residential ratepayers. Since no scenarios were proposed or reviewed in this proceeding, it would not be appropriate to make such changes at this time. It would also not be consistent with the Board's *Order*, dated September 30, 2015, which provided that a further proceeding will be initiated to "consider the remaining steps for the elimination of the seasonal class".<sup>1</sup>

Yours very truly, **Jay Shepherd P.C.** 

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email) Applicant and intervenors (by email)

<sup>&</sup>lt;sup>1</sup> Order (EB-2013-0416/0257), September 30, 2015

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