



## Jay Shepherd

Professional Corporation  
2200 Yonge Street  
Suite 1302  
Toronto, ON M4S 2C6

**BY EMAIL and RESS**

August 25, 2016  
Our File: EB20150363

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

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2015-0363 – Cap and Trade Regulatory Framework – IGUA Letter**

We are counsel to the School Energy Coalition (“SEC”). We are in receipt of the letter from the Industrial Gas Users Association (“IGUA”), dated August 15<sup>th</sup>, regarding the Board’s determination that cap and trade compliance costs are to be blended into the delivery line item on customers’ bills.

SEC writes in support of the letter of IGUA. It would be helpful for all ratepayers and stakeholders if the Board was to provide further explanation both for the reasons for its determination, and what specific information will it require natural gas utilities to provide about cap and trade on a customer’s bills. Customers should see directly how much it is costing them to emit greenhouse gas. As SEC stated in its comments on the draft Cap and Trade Framework, what makes these costs different from others included in the delivery line, is that customer-related compliance obligations are costs being recovered by natural gas utilities through rates, on their customers’ behalf, for their customers’ greenhouse gas emissions downstream.

Without an indication of what the Board will specifically require natural gas utilities to provide regarding cap and trade costs on monthly bills, SEC is unable to fully assess the likely impact of the Board’s determination to require the blending of customer-related compliance costs into the delivery line item.

All of which is respectfully submitted.

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

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Interested Parties (by email)

T. (416) 483-3300 F. (416) 483-3305

[mark.rubenstein@canadianenergylawyers.com](mailto:mark.rubenstein@canadianenergylawyers.com)  
[www.canadianenergylawyers.com](http://www.canadianenergylawyers.com)