



**BY EMAIL and RESS**

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March 7, 2018  
Our File No. EB-2017-0323/4

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2017-0323/4 – Enbridge and Union 2015 DSM Clearances**

We are counsel for the School Energy Coalition, and we are an intervenor in the above proceedings.

During the course of preparing interrogatories for these two applications, it became clear to us that the issues in the two applications are largely, but not entirely (perhaps 90%), the same. In fact, most of our interrogatories had to be duplicated in the two applications (with different evidence references, in some cases), with the necessity for Enbridge and Union to co-ordinate their responses to avoid duplication. There are several exhibits, including one expert report, that are common to both applications, and some – including other expert reports - that are not filed in both will in any case apply to both although only filed in one.

SEC believes that it may benefit the Applicants, the intervenors, and the Board if these two applications were heard by the Board together, i.e. combined technical conference, combined ADR, if any, and combined oral hearing. Given that the two utilities have common ownership, this should be less of a challenge for them than would normally be



the case, and could in our view significantly improve the productivity of all parties in the regulatory process.

All of which is respectfully submitted.

Yours very truly,

**JAY SHEPHERD P. C.**

A handwritten signature in black ink, appearing to read "Jay Shepherd", written over a light gray rectangular background.

Jay Shepherd

cc: Wayne McNally, SEC (email)  
Interested Parties