

BY EMAIL and RESS

Mark Rubenstein mark@shepherdrubenstein.com Dir. 647-483-0113

> February 4, 2019 Our File: EB20180056

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2018-0056 - NOTL 2019 Rates - Form of Hearing Submissions

We are counsel to the School Energy Coalition ("SEC"). Pursuant to Procedural Order No.3, these are SEC's submissions on which unsettled issues should be dealt with by way of written versus oral hearing. SEC has had discussions with the Applicant and they have agreed to file a few pieces of additional information to assist parties and the Board. With that agreement, SEC believes that there will be sufficient information on the record in this proceeding that all outstanding issues can be adequately dealt with by way of a written hearing.

If the Board does believe it would benefit from an oral hearing, SEC is willing to undertake cross-examination to assist the panel hearing this matter. Under that scenario, SEC submits that all three unsettled revenue requirement issues (underground conversion, OM&A, and long-term debt) should be heard orally.

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

Original signed by

Mark Rubenstein

cc: Wayne McNally, SEC (by email)

Applicant and interested parties (by email)