



BY EMAIL and RESS

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2300 Yonge Street
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July 23, 2019
Our File: EB20180264

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2018-0264 – EPCOR South Bruce Rates – Issues List Submission

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No.3, these are SEC’s submissions on the Draft Issues List.

Generally, SEC has no issues with the Proposed Issues List attached as Appendix A to Procedural Order No. 3. The issues generally match with the requested approvals and pre-filled evidence, which include all elements of a revenue requirement, gas supply plan, cost allocation and rate design, and the establishment of various deferral and variance accounts. The specific wording of the proposed issues anchors the proceeding in the context of EPCOR’s Common Infrastructure Plan (“CIP”) proposal in EB-2016-0136/137/138, yet provides the Board panel the necessary and legally required flexibility to vary from the CIP as may be proposed by a party (including EPCOR), if deemed appropriate.

SEC does note that under the Operating Expenses issue category (Issue 4), there is no explicit proposed issue regarding the appropriateness for the operating expenses (OM&A, etc.). SEC submits that an issue should be added using similar language regarding consistence with EPCOR’s CIP proposal and its appropriateness.

Yours very truly,
Shepherd Rubenstein P.C.

Original signed by

Mark Rubenstein

cc: Wayne McNally (by email)
Applicant and interested parties (by email)