



**BY EMAIL and RESS**

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September 23, 2019  
Our File No. 2019-0018

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-2019-0018 – Alectra Utilities – Submissions on Confidentiality**

We are counsel for the School Energy Coalition. Pursuant to Procedural Order #3, this letter sets out SEC's submissions with respect to the claim for confidentiality.

SEC has had an opportunity to review the submissions of OEB Staff, and notes that OEB Staff has cited past decisions in which the Board has allowed arrangements with utility consultants to be kept confidential.

SEC does not disagree that the Board has made such determinations in the past. However, we wish to register our concern with the tendency of regulated entities to seek to hide from public view by their customers the amounts the utilities pay to consultants to support their requests for higher rates. The utilities are spending money they get from the customers. In our view, it should be an exceptional case in which the arrangements they make using customer money should be kept secret from the public and protected from public scrutiny. By way of example, if a utility agrees to pay a consultant, say, \$500 per hour to support their rate application, that should generally be



information open to public review, and reported in the local newspapers if sufficiently interesting to the public. It should not be a secret.

All of which is respectfully submitted.

Yours very truly,

**SHEPHERD RUBENSTEIN PROFESSIONAL CORPORATION**

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