



**By EMAIL and RESS**

**Jay Shepherd**  
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January 12, 2021  
Our File: EB20200198

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

**Attn: Christine Long, Registrar**

Dear Ms. Long:

**Re: EB-2020-0198 – Enbridge Waterfront Relocation**

We are counsel to the School Energy Coalition ("SEC"). We have received the letter from the Applicant proposing ADR, and we write to lend SEC's support to that proposal.

It may be helpful to note two things. First, while most mediations at the Board have essentially two sides, in this case there will be at least Applicant, non-customers (City and Waterfront Toronto), and customers, all with different perspectives. There are also environmental groups, which may have a fourth perspective on some aspects. This may be a consideration for the Board in selecting a mediator.

Second, there is litigation currently commenced before the Courts related to this matter. The Board may wish to allow the parties to include in the scope of the ADR full or partial resolution of the lawsuit, so that the OEB process does not become a wasted effort. While we understand this may add complexity, it may also increase the value of the resulting agreement, if any.

All of which is respectfully submitted.

Yours very truly,  
**Shepherd Rubenstein Professional Corporation**

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

Jay Shepherd

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

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