



BY EMAIL and RESS

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Ontario Energy Board
2300 Yonge Street
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March 8, 2021
Our File: EB20200150

Attn: Christine Long, Registrar

Dear Ms. Long:

Re: EB-2020-0150 – NextBridge 2022-2031 Rates – Next Steps

We are counsel to the School Energy Coalition (“SEC”). SEC writes on its own behalf, as well as on behalf of the other ratepayer group intervenors in this proceeding (the Vulnerable Energy Consumers Coalition, Consumers Council of Canada, Association of Major Power Consumers in Ontario, Building Owners and Managers Association, and Energy Probe Research Foundation) in response to the letter from NextBridge dated March 4, 2021. In NextBridge’s letter it requests the Board issue a Procedural Order scheduling written argument in this proceeding.

The ratepayer group intervenors disagree with NextBridge’s proposed next steps and believe it is appropriate that the matter be heard through an oral hearing. This is the type of application which would benefit from cross-examination of the issues before a panel of Commissioners. NextBridge is a new utility operating a single transmission asset, seeking approval of its initial 9 year and 9 month rate plan, with an estimated revenue requirement of close to \$600M. The Board has never had to adjudicate a contested single asset transmission utility rate plan application before, and there are unique issues that arise from NextBridge’s proposal to apply a traditional revenue cap index approach. NextBridge is also seeking approval of its forecast construction costs of \$737M. The reasonableness of that amount has not been assessed by the Board given the issuance prior to the conclusion of the leave to construct proceeding of the directive from the Minister of Energy, Northern Development and Mines requiring NextBridge to construct the transmission line.

The ratepayer groups further submit there are also numerous interrogatory responses which NextBridge has not adequately responded to¹, or the answers themselves raise additional questions.²

¹ For example, see interrogatory responses SEC 10, SEC 7b, HONI 4a

² For example, see interrogatory responses SEC 5, SEC 6, OEB Staff 16, 29



An oral hearing, or at the very least, further discovery by way of a technical conference, is required so that the necessary information is placed on the record and can be tested.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Applicant and intervenors (by email)