



**BY EMAIL and RESS**

**Jay Shepherd**  
jay@shepherd rubenstein.com  
Dir. 416-804-2767

April 30, 2021  
Our File: EB20200194

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

**Attn: Christine Long, Registrar & Board Secretary**

Dear Ms. Long:

**Re: EB-2020-0194 – Hydro One Tax Implementation**

We are counsel to the School Energy Coalition ("SEC"). We have reviewed the Draft Rate Order provided by Hydro One, and did not find any discrepancies between the DRO and the Board's Decision.

SEC notes that the presentation of bill impacts, while technically correct, understates the actual impacts by including only the distribution riders. It does not appear to include the increases in transmission rates, nor the change to base distribution and transmission rates coming in 2022. By way of example, the bill impact tables show that a typical GSd rate school in the Hydro One distribution area will pay an additional \$80 per month over the next two years, a total of more than \$1 million for the affected schools. The actual impact, when transmission and base rate adjustments are included, is about \$125 per month. In total schools across the province will pay about \$4.4 million for the catchup payments, and more than \$700,000 per year additional after that. SEC believes that a more comprehensive reporting of bill impacts for all classes would have been preferred.

All of which is respectfully submitted.

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

A handwritten signature in dark ink, appearing to read "Jay Shepherd", is written over a light blue horizontal line.

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

**Shepherd Rubenstein Professional Corporation | Regulatory Law**  
2200 Yonge Street, Suite 1302 T. (416) 483-3300 F. (416) 483-3305  
Toronto, ON M4S 2C6 shepherdrubenstein.com