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BY EMAIL

July 25, 2008
Our File No. 2080150

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

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2008-0150 – Consultation on Energy Issues Relating to Low Income Consumers

We are writing this letter on behalf of the School Energy Coalition to express our interest in intervening in a limited way in the above-mentioned consultation.

As the Board is aware, SEC operates on a very carefully controlled budget, and so has to set rigorous priorities for processes in which it becomes involved. Many processes (Transmission Cost Responsibility, Farm Stray Voltage, Bruce to Milton, etc.) in which schools have some interest nevertheless are not sufficiently central to the mandate to warrant active involvement and use of scarce resources. We therefore propose to participate in this particular process only on a subset of the issues that may arise, if that is acceptable to the Board.

The ways in which the issues in this consultation affect SEC's members are the following:

1. School administrators are concerned about the well-being of their two million students, whose ability to learn is affected by their home environments. Many low-income students are affected by their limited home budgets, of which energy is a material component.
2. Any changes in how rates are designed to reduce the importance of cost causality as the primary driver – for example by adding social goals, or non-cost-related end user attributes – will affect schools in two ways. First, as ratepayers they could be among those bearing additional costs because another customer group is not paying their full share. Second, as unique energy users the non-cost principles that could apply to low income consumers may, in certain circumstances, apply to schools and other public sector consumers as well.

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With respect to the first of these points, SEC believes that there will be enough other parties dealing with these issues that SEC's involvement is not likely to add a lot of additional value. Therefore, we do not propose to deal with the low-income focused aspects of this consultation.

However, to the extent that the Board ends up considering customer classification, cost allocation, and rate design issues that are not based on cost causality, the principles being considered, and their impacts, are of significant concern to SEC, and we would like to be involved in that aspect of the consultation.

We would appreciate it if, in developing the procedures for this consultation, the Board could set a schedule that allows us – and perhaps other intervenors with a similarly restricted participation - to focus on a limited involvement, rather than sitting through extensive discussions on the low-income specific aspects, waiting for consideration of the more generic principles.

To the extent that SEC is involved, we would ask that we be found eligible for costs. SEC has been found eligible for costs with respect to numerous processes and proceedings before the Board in the past.

All of which is respectfully submitted.

Yours very truly,
SHIBLEY RIGHTON LLP

A handwritten signature in dark ink, appearing to read 'Jay Shepherd', is written over a light gray rectangular background.

Jay Shepherd

cc: Bob Williams, SEC (email)
Gail Anderson, SEC (email)
Interested Parties (email)