



**BY EMAIL and RESS**

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January 27, 2022  
Our File: EB20210019

**Attn: Nancy Marconi, Acting Registrar**

Dear Ms. Marconi:

**Re: EB-2021-0019 – Enwin Utilities Inc. 2022 Phase 2 – SEC Submissions**

We are counsel to the School Energy Coalition (“SEC”). These are SEC’s submissions on the request from Enwin Utilities Inc. (“Enwin”) for approval to amend the definition of its Large Use – 3TS Service rate class by removing the 5,000kW demand threshold. This change would allow any customer whose premises is serviced by a dedicated Enwin-owned and transmission connected transformer station to be included in the Large Use – 3TS Service rate class, regardless of their demand.<sup>1</sup>

SEC has reviewed the application and participated in the Technical Conference. Based on the evidentiary record, SEC does not object to the requested change in the rate class definition. The primary driver for the existence of this rate class is not a customer’s level of demand, as the company already has a Large Use rate class. It is that there is a dedicated transformer station used to service each customer, the costs of which are directly allocated to the class.<sup>2</sup>

SEC understands that the customers who may be impacted by the change, those in the class, are either supportive or have not raised any concerns.<sup>3</sup> With respect to the impact on other classes, the evidence is that no existing General Service customers would be impacted by the change, and no existing customers will be transferred into the revised class.<sup>4</sup> Moreover, the nature of the requirement that the customer’s premises be serviced by a dedicated transmission connected Enwin-owned transformer station, the class is unlikely to attract any new customers in the future that are not very sophisticated electricity customers.<sup>5</sup>

SEC does note that the definition, as set out in the proposed Tariff of Rates and Charges, is not the same as what is included in the evidence.<sup>6</sup> The Tariff of Rates and Charges simply refers to a

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<sup>1</sup> Application, p.19; Technical Conference Transcript, p.38

<sup>2</sup> Application, p.21; Technical Conference Transcript, p.8-9

<sup>3</sup> Application, p.20

<sup>4</sup> Application, p.20

<sup>5</sup> Technical Conference Transcript, p.11, 28

<sup>6</sup> Application, Appendix C, p.5; Technical Conference Transcript, p.38



customer whose premises is serviced by just a dedicated transformer station, as opposed to being serviced by a dedicated Enwin-owned transmission connected transformer station, consistent with the evidence. SEC believes that it would be appropriate to amend the proposed definition in the Tariff of Rates and Charges to match the definition proposed in the evidence.

Yours very truly,  
**Shepherd Rubenstein P.C.**

Mark Rubenstein

cc: Ted Doherty, SEC (by email)  
Applicant and Interested Parties (by email)