



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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January 27, 2022  
Our File: EB-2021-0148

**Attn: Nancy Marconi, Acting Registrar**

Dear Ms. Marconi:

**Re: EB-2021-0148 Enbridge 2022 Rates and Incremental Capital Module Application**

We are counsel for the School Energy Coalition (SEC). On behalf of our client, and in collaboration with other intervenors, we request that the Board make provision for a settlement conference in this proceeding. This would be consistent with Procedural Order No.1 where the Board noted intervenors have requested a settlement conference, and stated the Board will make determination on additional procedural steps and the type of hearing later in the proceeding.

After reviewing evidence and interrogatory responses filed by the Applicant, SEC believes providing for a settlement conference would facilitate the efficient resolution of some or all of the issues by the parties. The following intervenors have advised SEC that they support this proposal:

Canadian Manufacturers & Exporters;  
Consumers Council of Canada;  
The Corporation of the City of Kitchener – Utilities Division;  
Energy Probe Research Foundation;  
Environmental Defence Canada Inc.;  
Federation of Rental-housing Providers of Ontario;  
IGUA- Industrial Gas Users Association;  
London Property Management Association;  
Pollution Probe Research Foundation;  
Six Nations Natural Gas Company Limited.

A settlement conference is particularly fitting for the present Application because the actual 2022 rates of the Applicant hinge on a) the construction progress of the proposed ICM projects, and b) the OEB's decision in the ongoing Leave to Construct application (EB-2020-0293) for the St. Laurent project, which proceeding will not conclude for some months. A settlement conference would, among other things, allow the parties to agree on flexible arrangements around uncertainties associated with these timelines.

As the Applicant filed their Interrogatory Responses on January 21, 2022, we propose a settlement conference to be held virtually on February 22, 2022, subject to the Hydro One JRAP schedules. SEC



understands that the schedule will be for the Board to determine in its own discretion. The proposed settlement conference date is a suggestion only.

All of which is respectfully submitted.

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

Fred Zheng

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