



By EMAIL and RESS

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Our File: EB-2024-0092

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

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2024-0092 – Capacity Allocation Model Advisory Group

We are counsel for the School Energy Coalition (SEC). On behalf of SEC, the undersigned is self-nominating Jay Shepherd to be a member of the CAMAG.

All customers have, of course, an interest in the allocation of cost responsibility for system expansion by electricity distributors. For schools, this interest is particularly acute, because residential system expansion almost inevitably includes additional schools. Further, in areas in which there is a major expansion, which would be those for which the capacity allocation model is being designed, schools tend to be among the early non-residential customers being connected.

On the other hand, to the extent that new developments are not covering the costs of expansion, at least initially, schools are among the existing customers required to bear the expansion costs in the meantime.

Thus, for SEC it is imperative that system expansion use a rational and rigorous method to allocate cost responsibility.

The undersigned has long experience representing customers and others before the OEB. In addition, in the past the undersigned has participated in detailed negotiations with distributors on behalf of developers on precisely the issues being addressed by the advisory group, i.e. the intersection of cost responsibility with the long term (20+ years) nature of certain system expansions. This includes comprehensive understanding of the barriers to housing development that can arise with an overly front-loaded allocation



methodology, but also the risks associated with existing customers bearing too much of the cost until future, less certain customer connections arise.

The undersigned has no conflicts that could be related to the work of this advisory group.

Therefore, the undersigned self-nominates to be a member of the CAMAG. SEC requests that it be allowed to recover the costs associated with that membership in the manner described in the OEB's letter.

All of which is respectfully submitted.

Yours very truly,

Shepherd Rubenstein Professional Corporation

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

Jay Shepherd

cc: Brian McKay, SEC (by email)
Interested Parties (by email)