



BY EMAIL and RESS

Mark Rubenstein
mark@shepherdrubenstein.com
Dir. 647-483-0113

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

January 23, 2025
Our File: EB20240199

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2024-0199 – Vulnerability Assessment Draft Report – SEC Comments

We are counsel to the School Energy Coalition (“SEC”). SEC broadly supports the OEB’s approach to electricity distributor vulnerability assessments as outlined in the Vulnerability Assessment Draft Report and the accompanying toolkit, prepared in response to the Minister of Energy’s 2023 Letter of Direction. The requirement for distributors to undertake vulnerability assessments is an important tool, not only for utility management in developing their Distribution System Plan, but also for intervenors and the OEB in assessing and evaluating rate applications.

At the same time, it is essential that distributors and the OEB ensure the results of the vulnerability assessments are considered alongside all other relevant information as part of the necessary balancing required to establish just and reasonable rates.

SEC has also had the opportunity to review a draft of the detailed comments of the Consumers Council of Canada (“CCC”). We agree with CCC’s recommendation that the proposed ‘generic option’ should reflect a greater degree of standardization of inputs.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Brian McKay, SEC (by email)