



By EMAIL and RESS

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October 14, 2025
Our File: 20250014

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

Attn: Ritchie Murray, Acting Registrar

Dear Mr. Murray:

Re: EB-2025-0014 – Oshawa Power 2026 Rates – Disclosure Motion

We are counsel for the School Energy Coalition (SEC). On Friday, October 10th, SEC received certain information in response to the Disclosure Motion that is currently being considered by the Commissioners.

With respect to the cost allocation and the risk register provided, SEC believes those are appropriate disclosure. If we have any followups, they can be dealt with in the oral hearing.

With respect to the revenue requirement and rate impacts of the upcoming building, the Applicant has provided a residential rate impact and an estimated incremental revenue requirement in their letter of October 10th, but no details or supporting calculations. We have asked for the calculations behind the revenue requirement, which we assume are a spreadsheet, but the Applicant has declined to answer on the basis that we can request that in the oral hearing. We would also like to see the rate impacts for other classes (schools are typically in GS>50), so that we can talk about this issue with our affected clients.

SEC believes that leaving these calculations – which the Applicant certainly has in hand, given they have provided the specific results – to the oral hearing would be a waste of hearing time, and make it impossible for the Commissioners to understand the impact of the upcoming building on the capital plan currently being presented. If we had the calculations in advance of the hearing, then if there is any followup it should take little time in the hearing.

We note that provision of the calculations would complete the response to the portions of IRR 1-X-9 dealing with revenue requirement and rate impacts. We also note that the most recent Revenue Requirement Work Form shows a deficiency of \$6.8 million, resulting in a 21.2% weighted average rate increase. The increase for a typical school is 27.6%, much higher than the residential increase. Depending on the detailed calculations of the building costs, the weighted average increase would go up to 35.6%, and the increase for a typical school would likely be almost 50%. These are all material numbers for customers of this utility.

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We therefore request that the OEB order the Applicant to provide the full calculations of the \$4.6 million revenue requirement for the building, and for the rate impacts for each of the rate classes.

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 faint, light-colored rectangular stamp or watermark.

Jay Shepherd

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