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**BY EMAIL and REGULAR MAIL**

November 28, 2008  
Our File No. 2080629

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Re: School Energy Coalition– Interrogatories**  
**Niagara-on-the-Lake Hydro Inc. EB-2008-0237**

We are writing on behalf of our client, the School Energy Coalition (SEC) in response to Procedural Order #3 in the above-captioned matter, in which the Board sought submissions from the parties regarding on a number of procedural items.

With respect to whether additional discovery is required, SEC does not believe a technical conference is necessary but does believe parties may benefit from the opportunity to ask clarifying questions to the interrogatory responses provided by the Applicant. SEC therefore submits that there be a second round of interrogatories restricted to clarifying questions on answers provided to interrogatories. For SEC's part we believe any such clarifying questions would be minimal.

SEC believes that a settlement conference would involve a considerable expense for all parties and, given the size of the utility as well as the applicant's position on the matter as set out in its letter of November 20, would not be cost effective in this proceeding.

SEC believes that a written hearing would be suitable.

All of which is respectfully submitted.

GREAT LAKES  
LAW



Yours very truly,  
**SHIBLEY RIGHTON LLP**

*Original signed*

John De Vellis

c.c.: Mr. Jim Huntindon (email only)  
Intervenors (email only)