



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

December 29, 2020
Our File: EB2020133

Attn: Christine Long, Registrar

Dear Ms. Long:

Re: EB-2020-0133 – COVID-19 Deferral Account Consultation

We are counsel to the School Energy Coalition (“SEC”). We write in response to the Board’s letter of December 16th regarding the next steps in the *Consultation on the Deferral Account – Impacts Arising from the COVID-19*.

We have had the opportunity to review the letter from Ontario Energy Association on behalf of certain of its members (“CLD+”) and agree that it would be beneficial for the webinar time to be lengthened to allow for greater dialogue amongst stakeholders, Board Staff, and its expert LEI. We also agree that a slightly longer period of time to file reply comments would be helpful.

In addition to the issue of the schedule, the Board’s letter noted that those participants who have been determined by the OEB to be eligible are allowed to claim a maximum of 5 hours for preparation and attendance at the webinar. Based on the current scheduled time for the webinar, this leaves only 2.5 hours for preparation. Considering that the Board has released a detailed policy proposal from Board Staff (35 pages), and 5 different LEI reports (a total of 214 pages), the allotted time is insufficient for stakeholders to properly review let alone consider their contents, and consult with clients, before the webinar. SEC requests that the Board significantly expand the scope of preparation time eligible to be claimed prior to the webinar.

SEC also requests that the Board provide updated information on utility balances in the various Account 1509 sub-accounts, if available. On September 24th the Board posted the balances in the various 1509 sub-accounts as of the end of July 31, 2020.¹ SEC submits that if the Board has updated balances from utilities, they should be provided to stakeholders so that more accurate information can be considered for the purposes of written submissions.

All of which is respectfully submitted.

¹ [Letter from the Registrar, Re: Consultation on the Deferral Account – Impacts Arising from the COVID-19 Emergency – Next Steps, September 24 2020](#)



Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Wayne McNally, SEC (by email)
Interested Stakeholders (by email)