

November 22, 2020

Submitted electronically to:

Matthew Edwards
Senior Policy Advisor
Ministry of Energy, Northern Development and Mines
Conservation and Energy Efficiency Branch
77 Grenville St., 5th Floor
Toronto, ON M7A 2C1

Dear Mr. Edwards,

**Re: ERO Number 019-2564
Regulatory proposal for province-wide implementation of Green Button**

The Coalition of Large Distributors (CLD) is writing on behalf of the following member organizations: Alectra Utilities Corporation, Elexicon Energy Inc., Hydro One Networks Inc., Hydro Ottawa Limited, and Toronto Hydro-Electric System Limited. We are writing with respect to the government's proposal for a regulation (ERO posting) to require electricity and natural gas distributors to implement Green Button province-wide.

The Ontario Ministry of Energy, Northern Development and Mines (ENDM) is considering proposing a regulation to require electricity and natural gas utilities to implement Green Button Download My Data (DMD) and Connect My Data (CMD) – together referred to as “Green Button”.

The CLD encourages the government to take advantage of the new CDM framework to assess, through pilots and demonstration projects, how Green Button-enabled applications can deliver an improved value proposition that benefits customers and the electricity system. This will facilitate a better opportunity to evaluate customer demand for, and use of, DMD and/or CMD to identify whether the value proposition of province-wide implementation of Green Button to ensure customer benefits from energy data access are maximized.

The CLD believes that third parties will be the main beneficiaries of utility Green Button investment. Accordingly, we believe there should be a cost recovery mechanism developed and administered through the Ontario Energy Board (OEB). This recovery mechanism should align with the OEB's principle of “Beneficiary Pays,” whereby beneficiaries of an infrastructure investment will contribute to the cost of an investment, so that third parties pay an appropriate share of the costs of Green Button implementation, protecting the interests of ratepayers.

Further, while the ERO posting contains plain language descriptions of the proposed changes, it does not contain any draft regulatory language for the proposal. The absence of draft regulatory language, and the details such language would provide, makes it difficult for stakeholders to provide substantive comments on regulatory proposals. The details are important when dealing

with a matter as technical and complex as Green Button, particularly with respect to concerns regarding the protection of consumer information.

Also, the proposal states that ENDM will “require that utilities implement additional features not included in the Green Button standard to help reduce red tape and increase usability for Green Button users.” The CLD believes that there needs to be further discussion with utilities before proceeding with any yet to be determined additional features with uncertain implications to avoid unintended implementation delays.

Therefore, the CLD strongly recommends that stakeholders are provided an opportunity to comment on the draft regulatory amendments regarding Green Button before the Ministry incorporates them as final regulations. This would allow participants to assess the proposed changes in detail and ensure critical issues are not overlooked and misinterpreted.

If you have any questions with respect to the above, please contact the undersigned.

Sincerely,



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