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Danie Levitan

Vice President, Stakeholder Relations

November 22, 2020

Matthew Edwards
Conservation and Energy Efficiency Branch
77 Grenville Street, 5th floor
Toronto, Ontario M7A 2C1

Re: ERO Posting 019-2564

Dear Mr. Edwards:

Thank you for the opportunity to provide comments on ERO Posting 019-2564, the regulatory proposal for province-wide implementation of Green Button.

Hydro One is Canada's largest electricity transmission and distribution service provider. Our values guide us to work relentlessly to serve homes, businesses and communities across Ontario. Hydro One applauds the Government of Ontario for giving residential customers greater choice in pricing plans between Time-of-Use (TOU) and Tiered Pricing.

Overall, Hydro One is supportive of the proposal to require all electricity and gas distributors in Ontario to provide Green Button Download My Data (DMD) and Green Button Connect My Data (CMD). We support the transparency, innovation and choice the Green Button standards provide for customers and it is critical that the proposal is implemented in a way that is fair to ratepayers.

Current Capability

Hydro One currently has Green Button DMD capability for residential and small business customers. Hydro One supports the optionality for utilities to obtain third-party software or use in-house tools, as every utility has a unique customer base and information technology configuration. A clear, concise definition of requirements for customer types should be included in the regulation, as different customers require different meter types. Hydro One supports the proposed exemption for customers of Hydro One Remotes. It is also important to note that Hydro One has approximately 94,000 customers that have been exempted from TOU rates due to the remoteness from cellular infrastructure. Customers exempt from AMI technology should also be exempted from Green Button requirements.

Cost Considerations

Although Hydro One would like to offer both Green Button DMD and CMD data to our customers, it is important that the costs are borne in a fair way. Hydro One 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.

Please do not hesitate to contact me if you have any questions or would like to discuss our recommendations in greater detail.

Best Regards,

A handwritten signature in black ink, appearing to read "Dan" followed by a stylized, cursive flourish.

Daniel Levitan