

Via ERO

November 22, 2020

Matthew Edwards
Conservation and Energy Efficiency Branch
Ministry of Energy, Northern Development and Mines
77 Grenville Street
5th Floor
Toronto, ON
M7A 2C1

Dear Mr. Edwards:

Re: (ERO #019-2564) Regulatory Proposal for Province-Wide Implementation of Green Button

Hydro Ottawa Limited appreciates the opportunity to submit comments on the Ministry of Energy, Northern Development and Mines' ("MENDM") regulatory proposal for province-wide implementation of Green Button.

Introduction

Hydro Ottawa Limited ("Hydro Ottawa" or "the utility") is a licensed electricity distributor, serving approximately 345,000 customers in the City of Ottawa and the Village of Casselman.

Hydro Ottawa remains committed to delivering value across the customer experience by providing reliable, responsive, and innovative services. Expanding customer value is a core element of the company's corporate vision and business strategy. Hydro Ottawa seeks to achieve this goal by leveraging technology, offering greater customer control and convenience, transforming the customer experience, and entering into strategic partnerships around innovative energy solutions.

Comments

The regulatory proposal encompasses three core requirements for energy providers to fulfill: (i) implement Download My Data ("DMD") and Connect My Data ("CMD"); (ii) procure or develop a software platform to enable DMD and CMD; and (iii) obtain DMD and CMD certification. In addition, the proposal contemplates that utilities implement additional features not included in the Green Button standard to help increase usability for Green Button users, such as the inclusion of

historical data and perhaps a maximum number of computer 'clicks' to increase customer usability.

Hydro Ottawa notes that it has been engaged in Ontario's Green Button initiative for several years. Its engagement has taken the form of participation in previous workshops and in the original pool of electricity utilities that piloted DMD implementation. In addition, Hydro Ottawa submitted formal comments following the workshops held in July 2016, as well as formal comments in January 2018 following the government's revisited Green Button implementation proposal in November 2017.

In its previous comments, Hydro Ottawa described its experience with piloting DMD as having yielded minimal benefits to customers and shared its experience with being able to satisfy customers' requests for energy consumption and usage data through other platforms. Hydro Ottawa ultimately requested that sufficient flexibility be granted to distributors to implement Green Button in a way that would complement sustained use of existing tools which have demonstrated their effectiveness and value to customers. Hydro Ottawa also noted in prior comments that no compelling evidence had been presented over the course of the Ministry's consultations on Green Button which demonstrated the existence of a robust business case in support of implementation of the data standard for all customer classes. The utility observes that the present regulatory proposal is likewise not accompanied by any such cost-benefit analysis. Nevertheless, Hydro Ottawa acknowledges the potential merits associated with standardizing the format of consumers' energy data and recognizes the commitment on MENDM's part to move forward with mandatory implementation of Green Button.

Hydro Ottawa currently has DMD functionality available for all residential and small commercial customers. While DMD is not currently available to Commercial and Large Use customers, these classes of customers are able to access their own consumption and usage data through other Hydro Ottawa-developed platforms.

The implementation of CMD for all customers entails a number of complexities in terms of automating, standardizing and authenticating third party access to customer data. In addition, there does not appear to be any compelling evidence to suggest that demand for the CMD functionality is high among residential customers in particular. The utility acknowledges that CMD functionality would be largely accessed by commercial customers interested in retaining a third party to review and audit energy usage in an effort to identify potential cost savings. While Hydro Ottawa believes that MENDM's proposed implementation timeline of two years would be sufficient to implement CMD, Hydro Ottawa is as of yet unaware of the cost implications associated with CMD implementation. That being said, Hydro Ottawa strongly recommends,

should MENDM proceed with its regulatory proposal, that energy providers be allowed to recover all costs associated with implementation in future rate application proceedings.

In terms of the additional features included in MENDM's proposal, Hydro Ottawa requests that the Ministry engage further with energy providers to define the additional features in more detail and identify the scope of what may be required prior to finalizing any regulatory amendments.

In a similar vein, Hydro Ottawa encourages the Ministry to revisit an aspect of its previous proposal for Green Button implementation issued in November 2017, which pertained to post-regulatory approval engagement with stakeholders. More specifically, the 2017 proposal contemplated the establishment of technical working groups to support the development and updating of implementation support documents. Hydro Ottawa expressed support for that element of the 2017 proposal, seeing as it would help ensure utilities are effectively prepared and positioned for success in serving customers. Hydro Ottawa recommends that the Ministry take a similar approach in the context of the present proposal, assuming the proposal is ultimately approved.

Conclusion

Hydro Ottawa appreciates this opportunity to provide comments and looks forward to continued partnership with the Ministry on opportunities to advance customer engagement, awareness and education through the deployment of innovative energy tools and solutions.

Sincerely,

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Director, Regulatory Affairs

Directeur, Affaires réglementaires

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