



By Email

September 23, 2022

Ministry of Energy
77 Grenville Street
7th Floor
Toronto, ON
M7A 2C1

Attention: Kevork Hacatoglu, Ministry of Energy, Conservation and Renewable Energy Division

Subject: Proposed Implementation of an Ultra-Low Overnight Electricity Price Plan for Regulated Price Plan Consumers (22-ENDM013)

Hydro Ottawa Limited (“Hydro Ottawa”) appreciates the opportunity to submit feedback on the Ministry of Energy’s (“Ministry”) proposal to introduce an Ultra-Low Overnight Electricity Price Plan (ULO Price Plan) for Regulated Price Plan Consumers.

Hydro Ottawa is a licensed electricity distributor serving approximately 353,000 customers in the City of Ottawa and the Village of Casselman. Hydro Ottawa is committed to delivering value across the customer experience by providing reliable, safe and responsive services to its customers.

Hydro Ottawa supports the Ministry’s proposed amendments to O. Reg. 95/05 under the Ontario Energy Board Act, 1998. In regard to the implementation of the new ultra-low rate option designed to encourage consumers to shift electricity use to overnight periods, Hydro Ottawa offers the following comments:

1. In order to support customers in making an informed price plan decision, Hydro Ottawa recommends that the Ontario Energy Board (“OEB”) communication materials are released no later than April 15, 2023. This timeframe will ensure that local distributor messaging is consistent with the province and the OEB and will enable distributors to finalize their communication efforts and channels, such as their website, social media channels, agent training. Hydro Ottawa also requests that the OEB communication materials be provided in both official languages.

Communication materials are recommended to ensure that customers who are considering the ULO Price Plan fully understand the other rate periods and associated rates within the ULO Price Plan and that the other rate plan rates are not applied at any time, as this may influence their overall electricity savings. For example, while the RPP rates are normally adjusted annually on November 1st, seasonal (i.e.,



summer/winter), the standard Time-of-Use (TOU) Plan hours, as well as the monthly consumption threshold which applies to the Tiered Pricing Plan, will continue to change each May 1st and November 1st. By comparison, the ULO Price Plan will not be subject to seasonal adjustments.

As the three plans have different rates and time periods that apply, it is important that customers have access to a bill calculator tool, so they may reasonably estimate their electricity consumption costs based on their usage history or anticipated usage patterns. As was the case with the introduction of customer choice, it is recommended that the OEB make available a bill calculator on its website in order for customers to make an informed decision as to which pricing plan best suits their needs. Based on the OEB presentation on September 13, 2022, it is understood that it is currently the OEB's plan to have a calculator available. Where feasible, distributors may offer an online calculator that can, ideally, be integrated with the customer consumption data on file.

2. It would be appreciated that any bill presentation impact be clarified as early as possible. Additionally, should it be expected that there will be flexibility in the bill presentation, having such clarification in the early stages of implementation would be beneficial in supporting customer communications, as well as, reducing overall implementation risks.
3. The ULO Price Plan, as well as the standard TOU, should be offered to net metering customers by enabling the MDM/R to accommodate net metering customers. By doing so, all eligible RPP customers will have access to the full suite of rate plans and associated benefits. Per the OEB's recent approval of the IESO Smart Meter Entity settlement agreement (EB-2022-0137), Hydro Ottawa understands that the IESO has committed to implementing net metering TOU billing as part of the it's 2023-2027 plan. The IESO should be encouraged to complete this work as soon as possible. It is important to note, it may also require additional time from distributors, in terms of effort and cost to make the necessary changes to their current billing infrastructure.
4. Given the six-month timeframe distributors have to begin offering the ULO Price Plan rate to customers, distributors should have flexibility as to when the ULO Price Plan election form is available to customers. In order to effectively manage customer expectations, Hydro Ottawa proposes that the lead time for offering the ULO Price Plan be reasonably aligned with the distributor's operational readiness to commence charging the rates associated with the new ULO Price Plan. Further, should provincial announcements regarding the new ULO Price Plan be made on or before May 1, 2023, customers should be informed that availability of the new ULO Price Plan will vary between May 1 to November 1, 2023.
5. In order to ensure a successful implementation, timely updates of the associated Codes is required by the OEB. One such example is section 3.5.4 of the Standard



Service Supply Code.

6. Further, for distributors which are not in a position to offer the ULO Price Plan as of May 1, 2023, yet are compliant no later than November 1, 2023, Hydro Ottawa requests that the associated Regulation and customer messaging confirms whether ULO Price Plan retroactivity is required.

Hydro Ottawa appreciates this opportunity to provide comments and looks forward to continued dialogue with the Ministry on this important customer initiative.

Sincerely,

DocuSigned by:

April Barrie

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April Barrie

Director, Regulatory Affairs

Directeur, Affaires réglementaires

AprilBarrie@hydroottawa.com

Tel./tél.: 613 738-5499 | ext./poste 2106

Cell.: 613 808-3261