

September 23, 2022

Kevork Hacatoglu
Ministry of Energy, Conservation and Renewable Energy Division
77 Grenville Street, 5th floor
Toronto, ON
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Submitted via e-mail

RE: Proposed Amendments to O.Reg 019-5849 Proposed Implementation of an Ultra-Low Overnight Electricity Price Plan for Regulated Price Plan Consumers

Hydro One Networks Inc. (Hydro One) would like to thank the Ministry of Energy for the opportunity to comment on the proposed amendments to O. Reg. 95/05 under the Ontario Energy Board Act, 1998. Hydro One is supportive of the Ministry of Energy and the enablement of customer choice options.

Implementation

Hydro One is supportive of a November 1, 2023 implementation date, as it will provide sufficient time for us to implement the Ultra-Low Overnight (ULO) rate into our billing system. The Independent Electricity System Operator (IESO) has provided technical guidance on a MDM/R solution, and Hydro One will continue to work with the IESO to implement ULO rate. The Ontario Energy Board has indicated the establishment of a deferral account to track the ULO, which will be necessary in tracking the financial impacts of the rate.

Customer Communications

As the ULO will only benefit some customers and not others based on their unique load profiles, Hydro One recommends the Ministry and OEB allow local distribution companies (LDCs) to have wide discretion over customer communications. Hydro One will provide customers with a bill calculator to provide customers with an opportunity to project bill impacts between tiered, TOU and ULO rate plans. LDCs have an understanding of their unique customer bases,

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and how this is communicated should be customized by each individual LDC.

Conclusion

Hydro One thanks the Ministry of Energy for the opportunity to comment on the implementation of ULO, and we look forward to collaborating on initiatives to support customer choice. Please do not hesitate to contact me if you have any further questions.

Thank you,

A handwritten signature in black ink, appearing to read "D. Relich".

Danny Relich
Director, Meter to Bill, Hydro One Networks Inc.