

## Environmental Registry of Ontario

Kevork Hacatoglu

Ministry of Energy, Conservation and Renewable Energy Division

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September 23, 2022.

### Re: Proposed Implementation of an Ultra-Low Overnight Electricity Price Plan for Regulated Price Plan Consumers – [ERO #019-5849](#)

Dear Kevork,

The Atmospheric Fund (TAF) appreciates the opportunity to comment on the Ministry's proposed optional enhanced time-of-use rate structure. TAF is a regional climate agency that invests in low-carbon solutions in the Greater Toronto and Hamilton Area.

TAF supports the OEB's proposed structure involving low overnight rates and higher on-peak rates. The proposed rate changes will be effective in both lowering electricity costs for ratepayers and reducing greenhouse gas (GHG) emissions. The proposed rate changes will reduce peak demand by incentivizing customers to shift demand to off-peak hours, which will lower overall electricity costs by reducing system costs of generation, transmission, and distribution. Further, the proposed TOU rates will reduce GHG emissions in Ontario by encouraging distributed energy resources, which can replace gas generation.

TAF echoes the comments and recommendations submitted by Environmental Defence. We particularly endorse their **recommendation to ensure that customers with net meters are allowed to participate in the optional TOU rate structure**. Customers with net meters currently get switched by utilities from TOU rates to tiered rates, which would exclude many customers from benefitting from the new enhanced rates. Additionally, net metered customers could provide additional power to the grid during peak demand times. **We recommend making this change simultaneously with the implementation of the optional enhanced TOU rates.**

We also endorse Environmental Defence's **recommendation to adjust price-setting methodologies before the November 2023 price reset**. If the methodologies aren't changed by that time, costs for customers on the new price plan will be inflated, which will result in new customers being overcharged for the electricity they consume. The inflated costs could deter customers who would have potentially switched to the new price plan. The OEB is currently planning to consider new price methodologies. To ensure the financial benefits of the new price plan, **we urge the Ministry to support this work and enforce the November 2023 deadline.**

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Sincerely,

Bryan Purcell



VP of Policy & Programs  
The Atmospheric Fund

## About the Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.