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Ontario Energy Board
P.O. Box 2319
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2300 Yonge Street
Toronto Ontario M4P 1E4
Attn: Kirsten Walli, Board Secretary

December 28, 2010

Re: EB-2010-0364 Consultation on Regulated Price Plan Time-of-Use Pricing.

Board Members

I wish to make comment re the above and Time-of-Use(TOU) pricing.

First, I wish to state that TOU pricing will not provide fair pricing and will not meet the objective of reducing overall costs, or reduce electricity consumption by consumers due to its invasive quality and the demand of societal change to implement.

I have saved a total of 21,767 Kilowatt/hours(KW/h) over a 7 year period, 2003 to November 2010. This represents 3.03 years of total yearly use using 2009 total use of 7196 KW/hours. This reduction was achieved without Time-of-Use or "smart meters".

The study started in 2002 and uses the first year 2003 as the base year. A published paper "Electricity Load Reduction for an Ontario Residential Home" was written in March of 2006 incorporating the first 3 study years. The results show a reduction in yearly usage of 34.2% from 12120 KW/h in 2003 to 7980 KW/h in 2005. The study shows reduction in electricity consumption by changing or eliminating appliances and components without changing the lifestyle of the home occupants. This was done with amazing results. This paper was published by The Ontario Power Authority on their web site.

In this paper under the heading "A Further Comment" it states "The results of this study do not indicate that the installation and use of "Smart Meters" would have been of any benefit in the reduction of electricity. In the author's mind the "Smart Meter" would have created a diversionary smoke screen, diverting the effort of reduction into a study of electricity usage or 'time of use'. It is strongly suggested by this study's findings that charging more for electricity usage in a particular time period of daily use will not reduce electricity use but simply charge more for electricity as a whole." This statement is more substantial now than when written in 2006.

We must ask the question "Do we really want to reduce electricity usage?"

In reading the Brattle Group Report is would seem that we are still in the dark as to the benefit if any of Time-of-Use pricing. This TOU pricing will not reduce electricity use and this is evidenced by The Brattle Group stating that there is no pricing that will benefit anything unless more studies/pilots are completed. We are now entering the 7th year of "Smart Meter/TOU" roll out without a definitive answer.

The "Smart Meter/TOU" initiative penalizes the average consumer due to the total lack of consumer knowledge of just what constitutes the pricing of the actual Hydro Bill. Until the consumer becomes totally informed and educated into the realms of electricity usage and how it affects the Hydro Bill nothing will happen.

In studying the electricity industry in Ontario, it is conceivable that the average monthly usage can be reduced to the 400 to 475 KW/h range in average residential usage by using energy conserving practices that are presently available. This represents 5.67 Terawatt/hours of reduction yearly just by having the proper energy consuming appliances and components. This reduction can occur without changing the life style of consumers.

The 1 watt rule for 'phantom power' usage, which has been instituted in USA since 2001 with little or no cost to consumers or generators is still not being considered in Ontario. The newly available Heat Pump Electric Hot Water Tank consumes less than 50% of the electricity for hot water. Why are these two items not being brought in as part of electricity conservation in Ontario? There are about 60 more items that are electricity conserving but not presently being made available or being brought into electricity conservation. One of these items is being presently sponsored by IBM at Carleton University Engineering department in Ottawa for the development of a heat-driven refrigeration technology for use in home air conditioning. This project will produce a Double Mechanism Sorptive Refrigeration (DMSR) system. This DMSR system involves a solid-liquid vapor heating process that uses significantly less electricity to lower cooling temperature than is possible in today's current refrigeration systems. It is estimated that the DMSR system will run at about 60 to 70% reduction in electricity use compared to present air conditioning.

There must be a balanced approach. The consumer must be informed how to reduce electricity usage. This is working if the reduction in total electricity usage 2004 to 2009 as illustrated by the IESO total TW/hours purchased is underlined. Both Hydro Ottawa and Power Stream distributors indicated that there was a loss in revenue due to a reduction in electricity use. This due to consumption equals distribution revenue.

Time-of-Use pricing must be balanced by supplying proper education in the knowledgeable use of electricity conserving appliances and components and that this knowledge be widely produced and disseminated and in some cases funded for the installation of these products.

These questions must also be answered:

Should TOU be instituted without proper and exacting consumer education of all facets of electricity use and all the components of their Hydro Bill?

Should TOU be instituted without supplying the necessary conservation items and information which are available or on items about to be produced?

Time-of-Use pricing will not on its own reduce electricity consumption but a more balanced and fairer system will reduce electricity consumption to levels unequalled in estimation.

Respectfully submitted,

[redacted]

Thomas G. Weir

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