

**From:** [BoardSec](#)  
**To:** [REDACTED]  
**Subject:** FW: Letter of Comment Submitted: EB-2013-0416  
**Date:** February 12, 2014 1:46:32 PM

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**From:** Webmaster  
**Sent:** February-12-14 12:48 PM  
**To:** BoardSec  
**Subject:** Letter of Comment Submitted: EB-2013-0141

## LETTER OF COMMENT

### Comments:

Any distribution rate increase by Hydro One should be vigorously rejected in the absence of a much more open and transparent discussion as to how these rates are determined and the factors influencing them.

We currently own two properties in the rural Ottawa area. At Clayton, in the period July-November 2013 distribution charges ranged from 46-50% of total electricity charges with distribution rates varying between 10.89 and 12.81 c/kWh. In December 2013, we were issued a correction statement reflecting months of overestimated of electricity charges, for which distribution charges reflected a massive 62.44% of total charges and a rate of 23.5 c/kWh. How can delivery of the "same" electricity result in a doubling of the cost. In January, 2014 distribution rates constituted 58-64% of total electricity charges at rates of 19.5-28.0 c/kWh. These distribution rates it should be noted exceed the off-peak, mid-peak and on-peak rates for electricity consumed by as much as 388%, 256% and 217% respectively. How can these rates bear further justified increases? Can Hydro-One identify any other commodity where the retail cost includes such excessive transportation costs and how can they defend their emphasis on conservation when such a large proportion of costs incurred is beyond the consumer's control and likely to increase with escalating distribution charges.

At our Woodlawn property, distribution charges reflect a more consistent cost of 43.3-50.5% of total electricity charges and rates of 9.1-13.1 c/kWh. Since both properties are designated rural residential why is there such a huge variation in rates charged? One possible explanation is the existence of a historical distribution network that is in need of rationalization. I have heard that the distribution cost at Clayton reflects a circuitous delivery system that completely ignores the fact that there are closer sources of electricity (e.g. Arnprior generating station). Rationalization of the grid would lead to shorter distances, lower distribution costs and greater reliability of electricity supply but there is no incentive for Hydro-One to do so as long as they can simply maintain the status quo and pass on financial costs.

In the case of Woodlawn there is a definite possibility for a more efficient and reliable distribution grid. Woodlawn was part of the Township of West Carleton until, at provincial initiative, it was forced into an amalgamation with the City of Ottawa. While many powers were transferred to the city through amalgamation, integration into the Hydro-Ottawa network was denied or ignored. Why should residents of west Carleton be forced to accept a more-expensive, less-efficient and less-reliable distribution grid from Hydro-One?

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**Company:**