HLC’s Submissions re EB-2015-0079

HLC wishes to submit the following regarding the above proceeding.

Bill Impacts

The year 2016 is unique because of a confluence of changes, mainly the elimination of the OCEB and the move to all-fixed rates. As shown in Exhibit DRO TC3, low volume residential consumers at the 10th percentile will see bill impacts ranging from 9.49% for UR to 20.56% for SR. And those below the 10th percentile will see much larger increases.

In addition low volume consumers can expect near 10% increases compounded onto the 2016 rates for 5 to 7 years.

These are the most severe impacts since the electricity industry was restructured and need full explanation.

Adequacy of Customer Notification.

The Hydro One bill insert does a good job of explaining the impacts on a “typical” 800 kwh/mo consumer. It does not fully warn low volume consumers at or below the 10th percentile of what is to come. HLC submits that special letters should be sent to low volume consumers explaining the rationale for the move to all-fixed rates.

The All Fixed agenda

While the Board’s position on this issue appears firm it does not have universal support here or in other jurisdictions. It is going to be extremely difficult to apply it to non-residential classes or transmission customers.

Hydro One’s rate application

Hydro One’s rate application appears to comply with all OEB directives; hence HLC supports it.

Seasonal Class Elimination

While clearly out of scope in this proceeding, the issue did get some attention at the TC and in various submissions.

Within the Board’s 10% impact rules, there is precious little room to make any changes to the SR class in the 7 year all-fixed phase-in period.

HLC supports the Board position to defer the issue to a separate stand alone proceeding where other options to establish density based rates for the seasonal class can be considered.

HLC opposes any attempt to partially dismantle the SR class.

All of which is respectfully submitted.

John McGee

Horseshoe Lake Coalition

Dec 11, 2015