



December 10, 2015

Harold Thiessen
Senior Advisor, Electricity Rates & Prices - Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4

Regarding Draft Rate Order EB-2015-00796

Dear Mr. Thiessen,

The following comments are in respect of the above draft rate order.

As has been stated in the past, FOCA believes that the move to All-Fixed delivery charges, and the related phase-in period addresses the concern that low consumption seasonal customers are not paying their fair share of the costs of delivery. Fully 46% of seasonal customers consume a monthly average of less than 150kWh.

FOCA sees no reason to further aggravate the penalty to low-volume users by the further step of eliminating the Seasonal Class. With All-Fixed delivery, the elimination of the Seasonal Class results in only marginal benefits to those customers moving to the R1 Class at the expense of very large negative impacts on those moving to the lower density R2 Class.

FOCA has stated in the past that "FOCA understands and accepts the principle of "user pay" as it relates to electrical delivery costs. *But FOCA cannot accept and vigorously objects to a plan that would see some of its' members receiving a total bill increase of over 200% "*.

In the face of such dramatic and hurtful potential increases, and given the limited options made available in Hydro One's August 4, 2015 report, FOCA would support the Hydro One recommendation to not eliminate the Seasonal Class, but move to all-fixed or substantially all-fixed delivery charge.

A partial reassignment of seasonal customers to other classes at this time is unacceptable.

Sincerely,

Ken Grant, President, FOCA

Terry Rees, Executive Director, FOCA

cc: Erin Henderson, Hydro One Erin.Henderson@HydroOne.com
Ian White, FOCA