

From: Jean Whidden [REDACTED]
Sent: Tuesday, October 1, 2019 8:16 PM
To: BoardSec <BoardSec@oeb.ca>
Subject: Subject: EB2016-0315

October 1, 2019

Attention Kirsten Walli:

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Please accept our comments into the EB2016-0315 rate filing as a Hydro One customer in two residences: both in the R2 and seasonal rate classes. We are not supportive of the Ontario Energy Board's ("the Board") proposal, even though we will see minimal benefits in the distribution rates of our primary residence. Please accept these specific comments:

First, it is important to note that the large cost increases to over 70,000 residences represent approximately 1.5 per cent of ratepayers in Ontario. This is a substantial portion of Ontario's electricity ratepayers that will be unduly disadvantaged by this change.

Second, the Board's proposal to eliminate the seasonal rate class within Hydro One will create inequitable treatment between other LDCs with seasonal rate classes that have been allowed to continue.

Third, the Board made a decided policy shift in 2016 by moving to fixed distribution rates and did not re-evaluate its proposal in light of that shift which increases the impacts on rates to Hydro One seasonal customers being removed from that rate class.

Next, while not directly tied to distribution rates, the Industrial Conservation Initiative puts a greater burden on Class B residential customers to cross-subsidize the electricity consumption on Class A loads. This comment intends not to provide commentary on that approach, but instead acknowledge it as fact, and note that the elimination of the seasonal class is another way that (some) residential consumers will pay increased costs for electricity so that large industrial loads can pay less.

Further, we note that the 2019 Hydro One report notes that seasonal residences with the lowest average consumption will see the highest rate increases. We have spent time, effort and money making our seasonal residence energy efficient, and we think it is disappointing that this initiative of the Board will penalize our efforts.

We find the position of the Board peculiar when contrasted with its mandate to "consider how well the utility's interests align with your interests". It is difficult for us to see the benefits of the Board proposal to eliminate the seasonal rate class, because over eight years of rate mitigation will be required to limit the rate increases to 10 per cent per year. Instead, we urge the Board to consider and implement the clearly defined position in the 2019 Hydro One report that does not require increased administrative burden (which in turn increases rates) and provides fairness to all its rate classes, while not unduly disadvantaging the seasonal rate class. We would encourage the Board to reconsider its position, and approve the Hydro One solution outlined in its 2019 report.

Regards,

[REDACTED]

Redstone Lake, Haliburton

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