

Via email to: boardsec@oeb.ca



Attention:
Board Secretary, Ontario Energy Board
P.O. Box 2319, 2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4
E-mail: boardsec@ontarioenergyboard.ca

May 27, 2020

**Re: EB-2019-0234/EB-2016-0315
PROCEDURAL ORDER NO. 2 Dated May 1, 2020**

FOCA herein provides comments with respect to the merits of the grounds which the OEB determined passed the threshold test in the motion threshold decision cited above and specifically “The Board’s Subsequent Decision to Move to All-Fixed Residential Rates”.

The Federation of Ontario Cottagers’ Associations (FOCA) represents the interests of Ontario’s 250,000 waterfront property-owning and is supported by our 500+ member associations from across the Province. Ontario’s waterfront property owners are represented in every Hydro One rate class but significantly, comprise the bulk of the 154,000 Hydro One Seasonal Rate class customers. As such, we continue to have considerable concern about any reassignment of customers between classes, and the resulting rate upheaval this might entail.

With respect to the move to all-fixed residential rates:

FOCA maintains that when the OEB issued a letter about the implementation of all-fixed charge distribution rates (which was then codified in a September 2015 OEB Order) this created a completely different context and implications for the March 2015 Order.

In the March 2015 Decision the Board was voicing concerns that low-volume seasonal customers were not paying the full costs of serving them, and the Board was relying on that fact as grounds to eliminate the Seasonal Class.

The policy decision and September 2015 Order subsequent fully addresses that concern by requiring the move to all-fixed charge residential distribution rates which, when completed, will result in low and high-volume seasonal customers paying the same charge for distribution service. The significance of that decision was, and remains, that both low and high-volume customers will be paying an equal and fair share of their costs, which was the major driver for the elimination of the Seasonal Class.

The move to all-fixed rates largely addresses the concern expressed by the Board regarding the disparity in distribution charges between high and low volume seasonal customers and results in a significant bill reduction for all high-volume seasonal customers.

According to Hydro One’s May 15, 2020 submission in this matter (Table 10, Page 4) the incremental impact from eliminating the Seasonal Class would be only a small bill reduction of under \$7 per month

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for those seasonal customers moving to the R1 residential class but would present a large incremental bill increase of over \$69 per month for those seasonal customers moving to the R2 residential class.

FOCA requests, based on the information now available to the Board as set out in Hydro One's October 1st submission, as well as on the evidence in the proceeding that led to the March 2015 Decision, that the Board find that the March 2015 Decision should be revised so as not to eliminate the Seasonal Class.

The multitude of rate changes within the past few years has meant that almost no one understands the bill system and how and why we got to this point. Eliminating the Seasonal class would be yet another change for 154,000 of Hydro One's customers, creating more confusion, and for no good reason. We would add that it would again bring into question the RRRP and DRP programs.

Respectfully,

A handwritten signature in black ink, appearing to read "Terry Rees". The signature is fluid and cursive, with the first name "Terry" being larger and more prominent than the last name "Rees".

Terry Rees, Executive Director
On behalf of

Federation of Ontario Cottagers' Associations
#201 – 159 King Street
Peterborough, ON K9J 2R8

trees@foca.on.ca

Phone: 705-749-3622 Fax 705-749-6522