



July 29, 2020

BY RESS

Ms. Christine Long, Board Secretary
ONTARIO ENERGY BOARD
2300 Yonge Street, 26th Floor, P.O. Box 2319
TORONTO, ON M4P 1E4

Re: Board File No. EB-2020-0152
Notice of Proposal to Amend the Standard Supply Service Code

Dear Ms. Long:

On July 15, 2020, the Ontario Energy Board (“OEB”) issued a Notice of Proposal to Amend the Standard Supply Service Code. The Notice invites written comments on the amendments by July 29, 2020. KWHI makes the following comments.

Comment #1 – Customer Notification

Section 3.5.5 of the proposed SSSC requires notice issued to a customer within 10 days of receiving the application. In addition, Section 3.5.8 of the proposed SSSC requires further notification to a customer as a bill message notifying the customer the pricing has changed.

Requiring an LDC to notify a customer about a pricing change numerous times is excessive, requires additional programming and would increase costs to LDC’s in terms of increased mailing costs.

The final notification is not required as the customer will have been previously notified that they are being switched and the customer should also be aware that the bill looks different from the previous month.

Comment #2 - Billing Quantities by the Smart Meter Entity

KWHI would prefer to continue to receive TOU billing quantities from the SME and apply the tiered pricing through its own process. While KWHI appreciates the OEB requirements to have billing quantity information independent of the pricing structure and use the Smart Meter Entity information as input for the centralized collection of data, KWHI would find it difficult to be able to implement this change in its billing system within the timeline given. The changes required to KWHI’s current legacy COBOL CIS are complex. It is unlikely that, even with dedicated



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resources working on this one initiative, KWHI would have the required programming in place for implementation on October 13, 2020.

KWHI is currently implementing a new CIS system and will have to process this change in both its legacy system and the new CIS system. The required changes to the legacy system will be a waste of valuable money and resources, given that the code changes will only be in service for a very short time period. KWHI's already strained IT resources would be better utilized on its new CIS as additional programming in its legacy system could delay KWHI's anticipated go-live date.

Comment #3 - Implementation

Upon implementation of allowing electricity customers on RPP to opt out of time-of-use prices, there is a possibility that many customers will want to switch to tiered pricing. When customers first get to make a choice, the timelines for processing applications may exceed 10 days as uptake may be high. It is suggested that the rules for processing the applications be relaxed during the introductory phase of the program. This is due to the shortened time for implementation and developing processes as well as the volume of applications that might be received.

Respectfully submitted,

Original Signed by:

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