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ONTARIO ENERGY BOARD
2300 Yonge St, 27th Floor
Toronto, ON M4P 1E4
Attn: Ms. C. Long
Registrar and Board Secretary

July 29, 2020

Re: EB-2020-0152 Notice of Proposal to Amend the Standard Supply Service Code

Dear Ms. Long

North Bay Hydro Distribution Ltd (NBHDL) is grateful for the opportunity to comment on the proposed amendments to the Standard Service Supply Code (SSSC) in case EB-2020-0152.

NBHDL would like to make the following comments with respect to the above noted proposed amendments.

1. Bill Messaging (Section 3.5.8)
 - While this requirement may seem simple on its surface, NBHDL anticipates potential problems. Currently NBHDL's bill management system does not enable the ability to produce targeted bill messages to specific customers. Previous on-bill messages have been targeted by class or some other group identifier. This requirement would be unique in the fact that it is a one-time message triggered by an event (RPP change) that would also need an ability to be deferred one billing cycle later if necessary. One-time bill messaging at the individual customer level is not a functionality that currently exists. NBHDL anticipates serious technical barriers and potentially significant 3rd party costs to comply with this requirement.
2. RRR (Section 3.5.9)
 - In relation to the bill message requirement, the OEB is also asking for quarterly disclosure of the bill messaging. This requirement has all the challenges of #1 above with the addition of a system requirement to keep a record of when and why a message may have to be deferred a single bill. NBHDL fails to see the value in creating this administrative burden, especially in light of the OEB's efforts to simplify LDC quarterly filing requirements, an initiative NBHDL continues to support.

3. Retailer Switching (Section 3.5.10 b)

- This section requires the LDC to make contact with a customer coming off their enrollment with a retailer to determine their RPP preference. The current process for NBHDL when processing a customer drop-off from a retailer is an automated one. There is no direct interaction between the LDC and the customer since they are already an NBHDL customer, and continue to be, requiring no further engagement. Implementing an intervention in this process would be incredibly time consuming if done manually or expensive if a programming change is deemed necessary. Both options could also lead to an increase in error rate for a process that already works well. NBHDL maintains that TOU should be the default choice and the onus should be on existing customers to advise NBHDL of their preference. Having the LDC enquire to customer preference when they become a customer is appropriate, but those dropping off of retailer pricing are already NBHDL customers making a rate choice to leave a contract. In that same decision-making process, the customer should be responsible for advising NBHDL if their rate preference differs from TOU.

4. Customer Communications (The Election Process)

- While NBHDL agrees that customers need to be informed of the status of their election, the amendments require what NBHDL considers to be an onerous amount of communication interaction between the LDC and the customer. The LDC would need to communicate on receipt of the election form (1), on completion of the change (2), and then on the 1st or 2nd bill thereafter (3). If the OEB is steadfast in the requirement for an on-bill message, NBHDL considers both (1) and (2) to be unnecessary, unless in the case of (1), the election form is incomplete.

In the case of (1), unless the form is incomplete there is not value in the requirement for communication. Based on the stated timelines for implementing change, the customer can be assured that the change will be in place for the next billing period or the one immediately after.

In the case of (2), again the timelines set out for the program already imply when the switch must take place. If the purpose is to further inform the customer exactly when the new pricing takes effect, NBDHL considers this redundant. The date at which the election form is submitted dictates the date at which the pricing take effect. Customers would simply need to be educated as to the program timelines.

5. Frequency of switching

- While NBHDL agrees with the OEB's assessment that a program designed around customer choice should allow the greatest degree of flexibility possible, we also maintain that a reasonable limit is justified. In the early stages of the program there will likely be the largest quantity of customer intake that will exist over the life of the program. Making sure that LDCs are not overburdened

administratively in these early stages should be a goal and will be critical to the success of the program as a whole. Limiting the optionality to, for example, once per quarter would ensure customers aren't making multiple switches unnecessarily in the early stages while also making sure that LDCs don't have multiple overlapping elections from the same customer, which would increase the possibility of error.

6. TOU vs. Tiered Calculator

- It is NBHDL's opinion that the OEB should take on the responsibility of providing customers with a tool to help them make an informed choice between RPP pricing options. While NBHDL would be responsible for providing historical data to assist in this choice, we do not think that LDCs should be put in a position where we could be seen as advising customers as to the benefits of one option or another. Especially given the context that both RPP price options are equitable in the aggregate. This is a role the OEB should take. Similar to the LDC bill calculator provided on the OEB website, an RPP bill calculator could be provided.

NBHDL looks forward to future communications with the OEB regarding this program. If any further clarification or information is required, please do not hesitate to contact me.

Regards,

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Cc: Matt Payne, President & CEO, NBHDL