



Registrar and Board Secretary
Ontario Energy Board
27th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

July 29, 2020

Dear Ms. Long,

Re: Consultation on Implementing the Process for Enabling Customers to Opt Out of Time-of-Use Pricing Ontario Energy Board File No: EB-2020-0152

On July 15, 2020 the Ontario Energy Board (OEB) issued notice under section 70.2 of the Ontario Energy Board Act, 1998 (OEB Act) about proposed amendments to the Standard Supply Service Code (SSSC) to enable electricity consumers on the Regulated Price Plan (RPP) to opt out of time-of-use (TOU) prices and to elect instead to be charged on the basis of tiered pricing. This was in response to the Government of Ontario announcement of June 1, 2020 that stated it intends to introduce customer choice for RPP consumers who pay TOU prices. This initiative is to allow those consumers to opt out of TOU pricing in favour of tiered prices starting November 1, 2020.

London Hydro concurs with and supports the submission by the EDA. However London is particularly concerned with the subject "Preparation of Billing Quantities by the Smart Metering Entity" and hence wishes to add the following commentary.

It is unclear to London Hydro what protocols and billing determinants will be required from the utility or provided by the MDMR for the proposed Tier pricing solution, as this information was not included in the proposed amendment. However, for the record London Hydro does not support any proposal introducing substantive changes in the current reporting structure as it will require significant CIS changes on the part of the utility. London Hydro would challenge that the OEB has failed to consider the unnecessary costs and complexity to billing systems to be incurred by utilities in implementing any change and also that this one proposal alone can seriously derail the November 1, 2020 implementation. The OEB has been advised in the working session and through post communications that this proposal is untenable. London Hydro would strongly suggest continuing to use existing MDMR interfaces without imposing additional/costly modifications.

London Hydro expresses its support for the government announced intent to enable customer choice, an initiative that would allow RPP TOU customers to opt out of TOU pricing and to pay tiered prices instead. London Hydro strongly believes the most cost effective solution would be to leverage existing LDC's capabilities/systems to provide Tier Pricing Option without the need for any MDMR changes to achieve the November 1st target date.

Respectfully submitted

A handwritten signature in black ink, appearing to read 'M Benum', written in a cursive style.

Martin Benum
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