

Aiken & Associates

578 McNaughton Ave. West
Chatham, Ontario, N7L 4J6

Phone: (519) 351-8624

E-mail: randy.aiken@sympatico.ca

Sept. 1, 2020

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long,

RE: EB-2020-0152 - Consultation on Implementing the Process for Enabling Customers to Opt Out of Time-of-Use Pricing – Notice of Revised Proposal to Amend the Standard Supply Service Code - Comments of London Property Management Association

On August 25, 2020, the Ontario Energy Board (“Board”) issued a Notice of Revised Proposal to Amend the Standard Supply Service Code (“SSSC”). The revisions proposed were in response to comments received from parties on the July 15, 2020 Notice of Proposal and the Board convened stakeholder meeting on August 13, 2020 that dealt specifically with receiving information under the time-of-use (“TOU”) and periodic (tiered pricing) framing structures from the Smart Metering Entity (“SME”).

These are the comments of the London Property Management Association (“LPMA”) with respect to the revised proposal.

SME TOU Framing Structure

As part of the revised proposal, the Board has revised the wording of section 3.5.13 of the SSSC that makes it clear that no changes to the MDM/R framing structure currently used by distributors are required for the purpose of billing customers on tiered prices. Specifically, the revised wording requires distributors to rely on the SME for the consumption amounts to be used for billing purposes, but does not specify or require any particular framing structure.

LPMA supports this revised wording as it makes clear that distributors can continue to use the TOU pricing structure for those customers that opt for tiered pricing. This allow distributors to avoid potentially costly changes to their billing systems and processes. In addition, as indicated by a number of distributors, by continuing to receive TOU data from the SME for those customers that have moved to tiered pricing, those customers

will continue to have access to their TOU billing quantities so they can more easily determine if they want to remain on tiered pricing or return to TOU pricing.

Customer Focused Wording Changes

LPMA supports the proposed wording changes in sections 3.5.4, 3.5.6, 3.5.8 and the addition of the new section 3.5.9, for the reasons noted below.

In aggregate these wording changes and additions reflect support for customer choice. For example, section 3.5.4 ensures that where practicable, customers will be switched to tiered pricing at the beginning of their next billing period, even if the notice from the customer was received less than ten business days from the beginning of that billing period. This will reflect enhanced customer service, where practicable.

Similarly, section 3.5.6 ensures that customers receive any notice based on their preferred method of communication, if known. This reflects an improvement from the original wording by ensuring that a customers' stated communication preference is maintained.

Landlord reversions are considered new accounts and are subject to section 3.5.8. This section requires that consumers be informed of their option to use TOU pricing or tiered pricing when a new account is set up for an RPP consumer or when a market price customer no longer wants to be charged spot market prices. LPMA supports this option being available to all new accounts, including those accounts that revert back to a landlord when a tenant vacates the premises.

LPOMA also supports the inclusion of the wording in section 3.5.9. This new section is complementary to section 3.5.8 in that section 3.5.8 does not cover situation of a customer that will have the option of TOU or tiered pricing as the result of a rate reclassification. The addition of section 3.5.9 ensures that such customers do not fall through the cracks and receive the same information about their options as do other residential and small general service customers.

Yours very truly,

Randy Aiken
Aiken & Associates