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September 1, 2020

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Notice of Proposal to Amend the Standard Supply Service Code to Enable Customers to Opt-Out of TOU Pricing
Ontario Energy Board File Number: EB-2020-0152

On July 15, 2020, the OEB issued proposed amendments to the Standard Supply Service Code to support the implementation the Government of Ontario's June 1, 2020 direction that electricity consumers on the Regulated Price Plan be given the choice to opt out of time-of-use pricing for Tiered pricing. Following working group engagement and the receipt of stakeholder comments, on August 25, 2020, the OEB issued revised proposed amendments (the "Revised Amendments") for review and comment.

Toronto Hydro is appreciative that the new Revised Amendments address many of the initial concerns, and adopt many of the suggestions, that were raised and proposed by Toronto Hydro and other utilities. The changes made within the Revised Amendments will allow for a much more streamlined and efficient implementation of the TOU opt out initiative.

Toronto Hydro has one further concern specifically related to scenarios involving landlord reversions. The OEB's direction within the Revised Amendments suggests that "Landlord reversions are also treated as a new account and would therefore also be subject to the revised proposed section 3.5.8.". Toronto Hydro is concerned with this interpretation as existing accounts reverting back to landlord responsibility do not generate "new accounts" and are not treated as such within Toronto Hydro's customer care process and billing system. Rather, these existing accounts are switched back to landlord control through an automated process that is subject to the landlord's reversion preference agreement with the utility, frequently covering large numbers of individual accounts. It seems unnecessarily costly and

generally unhelpful for the landlord to need to be prompted to choose a billing option each time one of their many tenants moves out, rather than simply have the utility revert to the landlord's pre-established preference for all their accounts, particularly when the reversion itself is already processed on such an automated basis.

Toronto Hydro submits that this issue can likely be resolved without altering the currently proposed wording of the Revised Amendments; it only requires a confirmation from the OEB that standard landlord reverts are not considered "new accounts" for the purposes of section 3.5.8. Landlords could inform utilities of their pricing preference when they set-up their account(s) for the first time (at which time it would be a genuine "new account" scenario) and/or incorporate these preferences into their landlord reversion agreement. This would avoid the need for a unique prompt on an individual account level whenever a tenant moves out, when the landlord's decision is very likely to be the same for many if not all their many individual accounts.

Toronto Hydro appreciates the opportunity to provide its comments on these proposed Revised Amendments. Please direct all correspondence, including any concerns with the above, to the email address regulatoryaffairs@torontohydro.com.

Respectfully,

A handwritten signature in blue ink that reads "Andrew J. Sasso". The signature is written in a cursive, flowing style.

Andrew J. Sasso
Director, Energy Policy & Government Relations
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