

EB-2019-0261

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF an application by Hydro Ottawa
Limited for an order approving just and reasonable rates and
other charges for electricity distribution to be effective
January 1, 2021 and for each following year through
December 31, 2025.

ARGUMENT-IN-CHIEF

FILED OCTOBER 13, 2020

ARGUMENT-IN-CHIEF

A. INTRODUCTION

1. This Argument-in-Chief is filed with the Ontario Energy Board (“OEB”) in connection with Hydro Ottawa Limited’s (“Hydro Ottawa” or “the utility”) Custom Incentive Rate-setting (“Custom IR”) Application (the “Application”) submitted under section 78 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B). On February 10, 2020, Hydro Ottawa submitted the Application to the OEB seeking approval for changes to the rates that it charges for electricity distribution for a period of five years, to be effective January 1, 2021 through December 31, 2025. Hydro Ottawa submitted an update to the Application that included 2019 year-end Actuals on May 29, 2020.
2. On March 31, 2020, the OEB issued Procedural Order No. 1, which provided for the delivery of and responses to written interrogatories from OEB staff and intervenors. Procedural Order No. 2, issued on May 29, 2020, provided for an extension to the submission of interrogatory responses after an extension request made by Hydro Ottawa. Through the interrogatory process, Hydro Ottawa received 609 interrogatories, not including sub-parts, and responded with more than 5,600 pages of additional evidence in support of the Application.
3. On June 22, 2020 the OEB issued Procedural Order No. 3 and an Approved Issues List. The Issues List included 30 issues under eight subject categories. Procedural Order No. 3 further made provision for a Technical Conference on July 15 and 16, 2020 and July 17, 2020 if necessary, as well as a Settlement Conference on August 10-12, 2020 to continue to August 13, 2020 if necessary.
4. A transcribed Technical Conference was held on July 15, 16, 17, and continued on July 21, 2020. OEB staff and the following eight intervenors participated in the Technical Conference: Building Owners and Managers Association (“BOMA”), Consumers Council of Canada (“CCC”), Distributed Resource Coalition (“DRC”), Environmental Defence

- (“ED”), Energy Probe Research Foundation (“Energy Probe”), Pollution Probe (“PP”), School Energy Coalition (“SEC”) and Vulnerable Energy Consumers Coalition (“VECC”) (herein collectively referred to as “the Parties”).¹ Following the Technical Conference, Hydro Ottawa submitted written responses to a total of 95 undertakings by way of an initial filing on July 29, 2020, and subsequent filings on August 5, 6, and 7, 2020.
5. The Parties attended a Settlement Conference on August 10-12, 2020. The Settlement Conference continued through August 13, 14, and 17, 2020. Over the course of the Settlement Conference, the Parties came to an agreement on all issues with the exception of one relating to cost allocation and rate design (Issue 7.3). A settlement proposal was filed with the OEB on September 18, 2020. The Parties proposed to proceed with a written hearing on the one outstanding issue with a condition that intervenors had an opportunity to provide a response to any new items raised in Hydro Ottawa’s reply submission.
 6. Pursuant to Procedural Order No. 7, OEB staff filed a submission on the settlement proposal on September 29, 2020. OEB staff submitted that the settlement proposal reflected a reasonable evaluation of Hydro Ottawa’s planned outcomes, including appropriate considerations of the relevant issues, and allowed for appropriate resources for Hydro Ottawa to achieve its outcomes in its five-year plan. OEB staff also noted that the outcomes arising from the OEB’s approval of the settlement proposal would reflect the public interest and would result in just and reasonable rates for customers.
 7. On October 2, 2020, the OEB issued Procedural Order No. 8, which accepted the settlement proposal as filed, and noted that further written reasons on the settlement proposal would be provided at a later date. Procedural Order No. 8 further made provision to address the unsettled issue by way of a written hearing.
 8. Hydro Ottawa files this submission as its Argument-in-Chief in this matter.

¹ Richard Parry and Nash Smith are registered intervenors in this Proceeding, but did not participate in the Settlement Conference.

B. UNSETTLED ISSUE

COST ALLOCATION AND RATE DESIGN

9. The OEB defines issue 7.3 in Procedural Order No. 3 as follows:

“Are Hydro Ottawa’s proposals for rate design (including, but not limited to, fixed/variable split, loss factors, retail transmission service rates, low voltage charges, generator charges including MicroFIT, retail service charges, specific and other service charges) appropriate?”

10. Hydro Ottawa notes that the unsettled issue only pertains to the fixed/variable split of the utility’s distribution charges for certain commercial customer classes.
11. As part of the written interrogatory and Technical Conference processes, Hydro Ottawa was asked about the proposed fixed/variable distribution split. In particular, there were questions relating to the commercial monthly service charges being above the non-binding ceiling as calculated in the OEB Cost Allocation Model.
12. Hydro Ottawa submits that the fixed/variable distribution split as outlined in its Application is reasonable and should be approved as submitted.

FIXED/VARIABLE SPLIT BACKGROUND

13. On May 11, 2005, the OEB issued the *2006 Electricity Distribution Rate Handbook* (the “Handbook”), which set out filing requirements and guidelines for distribution rates effective May 1, 2006. The Handbook’s guidelines for 2006 required Local Distribution Company (“LDC”) applications to contain, at a minimum, a summary of the application; the completed 2006 Electricity Distribution Rate (“EDR”) model; and supporting schedules. Hydro Ottawa filed its 2006 rate application on August 2, 2005. The 2006

- rates were set based on using a forward Test Year in the 2006 EDR model without any changes to the fixed/variable splits as calculated by the model. On April 12, 2006, the OEB approved Hydro Ottawa's 2006 Revenue Requirement.² These amounts were put through the 2006 EDR Model to generate the approved fixed and variable rates for all customer classes.
14. In 2007, the OEB set rates using the 2007 Incentive Rate Mechanism ("IRM") Model to adjust utilities' 2006 approved fixed and variable rates by the price escalator and X factor, as per the 2007 IRM Model. On April 12, 2007, the OEB approved Hydro Ottawa's fixed and variable rates for all customer classes, as updated using the IRM Model.
 15. For 2008 rates, the OEB adopted its multi-year rate-setting plan for distributors. At that time, Hydro Ottawa self-nominated to prepare a Cost of Service application for 2008-2010 distribution rates. For purposes of that application, Hydro Ottawa filed its Cost Allocation Study for 2006, following the OEB's methodology as set out in the policy document entitled *Board Directions on Cost Allocation Methodology for Electricity Distributors*.³ When completing the Cost Allocation Study, Hydro Ottawa noted in the Manager's Summary that for the General Service ("GS") 50-1,499 kW, GS 1,500-4,999 kW, and Large User classes, the monthly fixed charge calculated using the minimum system with Peak Load Carrying Capability ("PLCC") adjustment was significantly lower than the Monthly Fixed Service Charges in use at that time.
 16. Ultimately, Hydro Ottawa did not use the Cost Allocation model as a basis to establish the fixed portion of any of the commercial rates. Hydro Ottawa's 2008 fixed rates for these classes were kept at the 2007 base level, with only an adjustment made for the Smart Meter adder charge.

² Ontario Energy Board, *Decision with Reasons*, EB-2005-0381 (April 12, 2006), page 15.

³ Ontario Energy Board, *Board Directions on Cost Allocation Methodology For Electricity Distributors*, EB-2005-0317 (September 29, 2006).

17. On November 28, 2007, the OEB issued its report entitled *Application of Cost Allocation for Electricity Distributors*.⁴ This report stated that the OEB did not expect LDCs to make changes to their Monthly Service Charge that resulted in a charge higher than the ceiling. LDCs which were then above the ceiling value were not required to make changes to their Monthly Service Charge bringing it to, or below, the ceiling level. To date, no further direction has been issued by the OEB that has changed this expectation.

HYDRO OTTAWA 2021-2025 RATE DESIGN PROPOSAL

18. Hydro Ottawa has used the OEB's Cost Allocation Model to assign costs to customer classes for the purpose of designing rates for the 2021 Test Year. Hydro Ottawa did not submit a Cost Allocation Model for each year of its Application. Rates for subsequent years (2022-2025) were inflated proportionately from the previous year to recover forecast revenue requirement by customer class while maintaining fixed/variable proportions as closely as possible. As an exception to this process, in cases where year-over-year changes to customer numbers or demand resulted in a lower fixed monthly service charge for a customer class than the previous year, that charge was held constant. For this reason, fixed rates for the GS 1,500 to 4,999 kW customer class were held constant for the final two years of Hydro Ottawa's Custom IR period, and those for the Large User class for the final three years.
19. The Cost Allocation Model allocates proposed revenue requirement to customer classes using a combination of demand-based and customer-based allocating factors and produces two primary outputs for rate design purposes:
 - (a) O1 - Revenue to Cost Tab: calculates the revenue requirement by customer class that forms the primary input to rate design.

⁴ Ontario Energy Board, *Application of Cost Allocation for Electricity Distributors - Report of the Board*, EB-2007-0667 (November 28, 2007).

- (b) O2 - Fixed Charge / Floor Ceiling Tab: calculates three scenarios describing, by customer class, the monthly cost of servicing a customer under three sets of assumptions: avoidable cost, directly related cost, and minimum system cost.
20. Two of the scenarios described above – namely, avoidable cost and minimum system cost – have been commonly adopted as non-binding guidelines for developing lower and upper (floor and ceiling) bounds to the establishment of monthly service charges by customer class, also referred to as the monthly fixed charge. The OEB Chapter 2 Filing Requirements note, however, that “if a distributor’s current fixed charge for any non-residential class is higher than the calculated ceiling, there is no requirement to lower the fixed charge to the ceiling.”⁵
21. Since before the inception of the OEB’s standard Cost Allocation Model, Hydro Ottawa has focused on maintaining continuity in its rate design approach. The monthly (fixed) service charge, by customer class, is carried forward from year to year and inflated to reflect the changing cost of operation, while the ratio of revenues collected via the fixed and variable rate components is held as constant, where practical.⁶ As a result, the variable component of the rate design is adjusted to ensure recovery of the revenue requirement for the customer class. For 2021, this approach has resulted in the GS 50-1,499 kW, GS 1,500-4,999 kW, Large User and Standby Power customer classes having proposed fixed monthly service charges that exceed the upper bound as calculated in the Cost Allocation Study. Because there is no directive to adhere to the calculated ceiling rate, Hydro Ottawa is proposing to maintain the 2021 fixed monthly service charge for these classes at their 2020 approved values and to manage them in future years of the Custom IR period to maintain the proportion of revenues collected from fixed and variable charges. For the remaining customer classes, Hydro Ottawa is proposing to maintain the proportion of revenues collected from fixed and variable charges, taking into consideration bill impacts by customer class.

⁵ Ontario Energy Board, *Chapter 2 Filing Requirements For Electricity Distribution Rate Applications - 2018 Edition for 2019 Rate Applications* (updated July 12, 2018; addended July 15, 2019), page 50.

⁶ The Approved Settlement Agreement for Hydro Ottawa’s 2016-2020 rate term has exceptions to this general methodology. See: Hydro Ottawa Limited, *2016-2020 Custom Incentive Rate-Setting Approved Settlement Proposal*, EB-2015-0004 (December 7, 2015).

22. This approach is in line with other comparable LDCs who have maintained commercial fixed monthly service charges above the modeled ceiling for some or all of their commercial customer classes. Tables 1 through 3 below display the minimum system charges vs. published monthly service rates for Hydro Ottawa's commercial customer classes above 50 kW as compared to those of other Ontario LDCs.

Table 1 - Commercial Rate Group 1
Minimum System Charge vs. Published Monthly Service Rates

Utility	Rate Year ⁷	kW Range	Minimum System Charge	Published Monthly Service Charge	Variance Published to Min Sys	% Variance	Fixed / Variable Ratio
Hydro Ottawa	2021	50-1,499	\$76.46	\$200.00	(\$123.54)	(162%)	17 / 83
Hydro Ottawa	2020	50-1,499	\$99.45	\$200.00	(\$100.55)	(101%)	20 / 80
Toronto Hydro	2020	50-999	\$57.18	\$49.14	\$8.04	14%	3 / 97
Alectra Powerstream Zone	2017	50-4,999	\$100.33	\$140.97	(\$40.64)	(41%)	14 / 86
Alectra Horizon Zone	2019	50-4,999	\$95.55	\$389.40	(\$293.85)	(307%)	48 / 52
Elexicon Veridian Zone	2014	50-2,999	\$103.06	\$103.06	0	0%	15 / 85
Alectra Enersource Zone	2013	50-499	\$121.59	\$69.54	\$52.05	43%	11 / 89
Kingston Hydro	2016	50-4,999	\$105.62	\$105.62	0	0%	16 / 84
London Hydro	2017	50-4,999	\$39.64	\$157.55	(\$117.91)	(297%)	23 / 77
Kitchener Wilmot Hydro	2020	> 50	\$101.79	\$183.23	(\$81.44)	(80%)	19 / 81

⁷ Rates are presented for the most recent year for which a Cost Allocation Model was presented on the OEB web site.

Table 2 - Commercial Rate Group 2
Minimum System Charge vs. Published Monthly Service Rates

Utility	Rate Year ⁸	kW Range	Minimum System Charge	Published Monthly Service Charge	Variance Published to Min Sys	% Variance	Fixed / Variable Ratio
Hydro Ottawa	2021	1,500-4,999	\$370.17	\$4,193.93	(\$3,823.76)	(1,033%)	33 / 67
Hydro Ottawa	2020	1,500-4,999	\$543.15	\$4,193.93	(\$3,650.78)	(672%)	31 / 69
Toronto Hydro	2020	1,000-4,999	\$180.67	\$926.00	(\$745.33)	(413%)	7 / 93
Alectra Enersource Zone	2013	500-4,999	\$122.19	\$1,583.69	(\$1,461.50)	(1,196%)	44 / 56
Elexicon Veridian Zone	2014	3,000-4,999	\$371.29	\$5,415.56	(\$5,044.27)	(1,359%)	47 / 53

Table 3 - Large User Rate Group
Minimum System Charge vs. Published Monthly Service Rates

Utility	Rate Year ⁹	Minimum System Charge	Published Monthly Service Charge	Variance Published to Min Sys	% Variance	Fixed / Variable Ratio
Hydro Ottawa	2021	\$455.91	\$15,231.32	(\$14,775.41)	(3,241%)	30 / 70
Hydro Ottawa	2020	\$617.82	\$15,231.32	(\$14,728.40)	(2,929%)	30 / 70
Toronto Hydro	2020	\$180.63	\$4,099.14	(\$3,918.51)	(2,169%)	6 / 94
Alectra Powerstream Zone	2017	\$656.69	\$6,073.68	(\$5,416.99)	(825%)	30 / 70
Alectra Horizon Zone ¹⁰	2019	\$1,363.65	\$24,279.37	(\$22,915.72)	(1,680%)	68 / 32
Elexicon Veridian Zone	2014	\$256.03	\$8,135.28	(\$7,879.25)	(3,077%)	31 / 69
Alectra Enersource Zone	2013	\$652.63	\$12,486.80	(\$11,834.17)	(1,813%)	22 / 78
Kingston Hydro	2016	\$327.47	\$5,164.00	(\$4,836.53)	(1,477%)	36 / 64
London Hydro	2017	\$816.65	\$20,286.64	(\$19,469.99)	(2,384%)	37 / 63
Kitchener Wilmot Hydro	2020	\$85.68	\$17,043.47	(\$16,957.79)	(19,792%)	75 / 25

⁸ Ibid.

⁹ Ibid.

¹⁰ This represents a non-dedicated Large User customer class.

23. As mentioned above, Hydro Ottawa responded to questions during the interrogatory and Technical Conference processes on its proposed monthly service charge in comparison to the non-binding ceiling and the fixed/variable split. Tables 1 through 3 above demonstrate that Hydro Ottawa is not out of line with other utilities in the establishment of monthly service charges above the modeled ceiling. In fact, Hydro Ottawa's proposed rates are closer to the ceiling than many others in the cohort presented. The fixed/variable ratios in the last column of each table also reveal that Hydro Ottawa is currently collecting a smaller proportion of revenues through the monthly service charge than many of its peers. In addition, on average, only 20% to 30% of Hydro Ottawa's commercial customers' distribution charge is related to the fixed monthly distribution service charge.
24. Monthly service charges have been developed over time and, in Hydro Ottawa's case, the basis for that development predates the inception of the OEB Cost Allocation Model. The monthly service charge represents the cost of maintaining the customer's use of the distribution system and goes beyond the cost of billing and collecting to further consider the cost of maintaining sufficient load in the system to serve the customer's requirement. The modeled scenarios in the OEB Cost Allocation Model represent an approach to defining customer cost but do not, in Hydro Ottawa's view, adequately account for all customer-related costs. Indeed, these scenarios do not encompass all the costs that the Cost Allocation Model itself defines as customer-driven. Hydro Ottawa estimates that the Large User class's monthly service charge would increase by approximately \$1,600 if all customer-driven costs were included.
25. Additionally, a proportion of demand-based costs representing the minimum demand requirement for a customer's rate class could reasonably be added to the calculation of the monthly service charge. For the Large User class, Hydro Ottawa calculates this addition would increase the estimated ceiling monthly service charge by approximately \$3,100 in 2021. These two changes alone would increase the monthly ceiling for the service charge by approximately \$4,700.

26. If obligated to redefine the monthly service charge, Hydro Ottawa would avail itself of the ability to develop a company-specific Cost Allocation model¹¹ that defines the full cost of customer service based on the principle of cost causality. The OEB has agreed that the delivery system operated by an LDC is essentially fixed in nature for residential customers.¹² Accordingly, beginning in 2020, Hydro Ottawa's residential rates are fully fixed, yet the Cost Allocation Model still models a ceiling that is less than the calculated monthly service charge and would not recover the full revenue requirement for the class.
27. The OEB's ongoing consultation to review commercial and industrial rates¹³ reflects a potential change in philosophy for non-residential customers as well. These policy changes and reconsiderations reflect the realization that a local distribution network is much more responsive to growth in customer numbers or demand than it is to contraction of either of those determinants. It is therefore important that each customer's monthly service charge captures the full cost of that customer's place in the network. Reducing the fixed charge for a customer class creates the risk of a revenue shortfall should consumption or demand fall short of forecast levels, in turn obliging other customers in the same class or other classes to contribute the difference, which is counter to fundamental principles of economic regulation.

IMPACT ON CUSTOMERS

28. Hydro Ottawa did not analyze the impact of shifting costs from the monthly service charge as part of its Application given current OEB policy. That said, Hydro Ottawa has determined that some customers will have large negative impacts if the monthly service charge was set to the ceiling.

¹¹ OEB Chapter 2 Filing Requirements state the following: "A completed cost allocation study using the OEB-approved methodology **or a comparable model** must be filed." *Filing Requirements For Electricity Distribution Rate Applications - 2017 Edition for 2018 Rate Applications*, Chapter 2, page 46.

¹² Ontario Energy Board, *Fixing Distribution Rates - Rate Redesign Background* (April 6, 2015), Available at https://www.oeb.ca/oeb/_Documents/EB-2012-0410/OEB_Distribution_Rate_Design_Background_20150406.pdf

¹³ Ontario Energy Board, *Rate Design for Commercial and Industrial Electricity Customers*, EB-2015-0043 (February 21, 2019).

29. If a change in the policy is considered, Hydro Ottawa suggests it should be contemplated on a generic basis and not applied to a single utility. In addition, any review should include a full assessment that looks at the magnitude of the bill impacts, the type of customers/industries impacted, and if the change reflects the cost of serving the customer on the distribution grid. Any change requires an assessment of an appropriate transition period. The Residential transition to fully fixed generically was set over four years. Hydro Ottawa required five years to mitigate the impact of the customer who would be impacted the greatest. Some distributors required a longer transition period.
30. Lastly, given the ongoing impacts of COVID 19, Hydro Ottawa does not believe this is an appropriate time to introduce a new rate design policy to commercial customers. Each customer can be impacted differently and some customers will be significantly negatively impacted by a movement away from the existing rate design which has historically been in place.

CURRENT OEB POLICY AND ONGOING CONSULTATIONS

Rate Design for Electricity Residential Customers (EB-2012-0410)

31. As part of EB-2012-0410, the OEB set the residential distribution rate design to be fully fixed. In its April 2, 2015 policy report entitled *A New Distribution Rate Design for Residential Electricity Customers*, the OEB states,

“Under the OEB’s legislation we must consider the interests of customers in everything we do. We believe that current and future customers’ interests are best protected when distributors provide efficient, safe, and reliable service over the long term. We call this value for money.

We also have a responsibility to promote conservation and renewable generation and to facilitate the technological development of the system (known as smart grid). These factors are part of the public policy framework which guides our work.

In everything we do, we strive to bring together the interests of customers and distributors within the overall public policy framework to ensure value for money for customers. This new policy is an example of that alignment of customer and distributor interests within the public policy framework.”¹⁴

32. According to the OEB, the intent of the policy changes was to achieve three main goals:
- It will enable residential customers to leverage new technologies, manage costs through conservation, and better understand the value of distribution services.
 - It is a fairer way to recover the costs of providing distribution service.
 - It will provide greater revenue stability for distributors, which will position them for technological change in the sector, remove any disincentive to promote conservation, and help with their investment planning.
33. It was further elaborated that the OEB’s “goal is to equip customers with the information and the tools they need to make informed choices about how they use energy.”¹⁵ In achieving this goal, the OEB stated that its policy will:
- Enable customers to leverage new technologies, including self-generation using renewable resources;
 - Help customers manage their bills through conservation; and
 - Help customers better understand the value of electricity service.
34. Hydro Ottawa notes that the OEB acknowledges that customers need to understand the value of electricity service in order for customers to “make informed choices about how they use energy.”¹⁶ The policy change reflects the fact that the distribution grid is valued based on its cost drivers, which are different from other aspects of the grid. The OEB

¹⁴ Ontario Energy Board, *A New Distribution Rate Design for Residential Electricity Customers*, EB-2012-0410 (April 2, 2015), page 2.

¹⁵ *Ibid.*, page 5.

¹⁶ *Ibid.*

also notes that the “fixed charge will also provide greater assurance that investment costs will be recovered.”¹⁷

35. Hydro Ottawa’s residential distribution charge became fully fixed as of January 1, 2020. As noted earlier, this is above the ceiling as calculated by the OEB Cost Allocation Model.

Rate Design for Commercial and Industrial Customers (EB-2015-0043)

36. In its February 21, 2019 report to the OEB entitled *Rate Design for Commercial and Industrial Customers*, OEB staff states,

“In response to the changing landscape and customer expectations, a new electricity rate design is needed to enable more customer choice in investments and technology while ensuring that reliability of the electricity distribution system is maintained. Customer behavior and use of the grid is changing. Their dependence on, and relationship with the distribution grid varies greatly and is increasing in complexity. Traditional consumers continue to draw electricity from the grid to power their operations. Active customers are trying to reduce their bill by managing the amount or timing of their use through behaviours and technology. Advanced customers may expect the grid to supplement their self-generation, to provide backup power, to provide ‘storage-like’ support, or to deliver their produced electricity to other customers depending on price. The direct impact of these new, emergent uses and expectations of the grid is related to the size and number of customers that change their use of the system. The distribution network is necessary to serve the needs of all of these customers, whether traditional users or those selecting new technologies which rely on the system.

¹⁷ Ibid., page 20.

The rate design adopted for distribution service needs to reflect the value of the system while reflecting and encouraging sound economic choices, including investments by distributors necessary to maintain reliability.”¹⁸

37. As presented in its Stakeholder Information presentation delivered in March 2019, policy objectives for commercial and industrial rate design are as follows:

- Support innovation for customers;
- Increase efficiency of the system; and
- Facilitate investments to modernize the grid in a paced and prioritized manner that will support customer choice and efficiency.¹⁹

38. Hydro Ottawa suggests that the questions raised during the written interrogatory and Technical Conference processes regarding Hydro Ottawa’s current rate design are already being considered by the OEB as part of its Commercial and Industrial Rate Design consultation, the scope of which includes cost-effective energy solutions that ensure customers still value their connection to the grid. Therefore, as discussed in paragraph 29 above, Hydro Ottawa suggests this policy issue should be dealt with in a generic manner and not as part of Hydro Ottawa’s Application. It is further noted that should a rate structure be ordered as part of this proceeding that is different from Hydro Ottawa’s historical rate design structure, Hydro Ottawa’s commercial customers could be subject to multiple distribution rate designs in a relatively short period of time. This could result in customers experiencing fluctuations in their bills and potential temporary increases and decreases related to different rates design, which could lead to customer confusion and dissatisfaction.

¹⁸ Ontario Energy Board Staff, *Rate Design for Commercial and Industrial Electricity Customers*, EB-2015-0043 (February 21, 2019), page 2.

¹⁹ Ontario Energy Board Staff presentation, “Commercial and Industrial Rate Design for Electricity - Stakeholder Information Session on Staff Report to the Board,” (March 2019), slide 12.

Hydro Ottawa's Fixed / Variable Split Position

39. Hydro Ottawa submits that its proposed distribution rate designs are appropriate and fall within current OEB policy and guidelines, and that the OEB should accept Hydro Ottawa's rate designs as proposed.