

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

October 20, 2020

**Re: EB-2019-0261 Hydro Ottawa Custom IR 2021-2025
Pollution Probe Submission**

Dear Ms. Long:

In accordance with Procedural Order No. 8 dated October 2, 2020 please find below Pollution Probe's Submission for the above-noted proceeding.

Pollution Probe has had an opportunity to review the Submissions of Environmental Defence dated October 16, 2020 and concurs with those submissions. Furthermore, increased fixed costs (particularly significantly above the proposed OEB ceiling) remove the ability for customers to manage variable costs, take action and reduce their energy bills. This is particularly important in light of the cost pressures on business due to COVID-19. A higher allocation of fixed costs also removes the incentive for market-based solutions such as Distributed Energy Resources and other solutions required to modernize cost-effective energy solutions for Ontario energy consumers.

This rebasing application is a logical time to come in alignment with using the fixed rate ceiling from the OEB's Application of Cost Allocation for Electricity Distributors. Requiring Hydro Ottawa to reduce its fixed charges over this incentive period to be more in line with the OEB ceiling is also in alignment with the Board's acceptance of the Settlement Proposal dated October 2, 2020. The settlement proposal outlines the commitment for Hydro Ottawa to coordinate with the City of Ottawa energy and emissions plan (referred to as Energy Evolution) to find costs effective solutions for consumers. Reducing energy and emissions is only supported by providing the price signal from variable costs rather than over-weighting fixed costs allocation.

Respectfully submitted on behalf of Pollution Probe.



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cc: All Parties (via email)