

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

October 30, 2020

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


Dear Ms. Long:

In accordance with Procedural Order No. 8 dated October 2, 2020 please find below Pollution Probe's Reply Submission for the above-noted proceeding. Pollution Probe focuses on new elements Hydro Ottawa included in its Reply Argument and has avoided repeating material from its Argument.

Hydro Ottawa suggests that based on the evidence and information before the OEB in this case that the OEB is restricted with a decision of strictly accepting the Hydro Ottawa proposal or the proposal put forward by Environmental Defence (and supported by other parties including Pollution Probe). Of course, the OEB also has the ability to phase in the reduction in fixed cost allocation in any manner it deems suitable over the Customer Incentive Regulation (CIR) period. Hydro Ottawa's application is a CIR application and this provides significantly more options to the OEB than may be available if Hydro Ottawa had not requested customized treatment. The OEB priority to enhance consumer benefits in line with modern energy policy is clear and this decision will impact Ottawa energy consumers out to at least 2025. Pollution Probe suggests that proposal put forward by Environmental Defence is more 'forward looking' and appropriate at this time of change and opportunity in the City of Ottawa.

The benefits of reducing over-allocation of fixed costs in alignment with the OEB's Application of Cost Allocation for Electricity Distributors have been made clear within this proceeding. Hydro Ottawa has accepted the general concept related to variable rate benefits and has indicated its support for CDM, DER and the City of Ottawa Energy Evolution Plan. With recent unanimous Ottawa Council approval of Energy Evolution, needed change will only accelerate from now to 2025.

Respectfully submitted on behalf of Pollution Probe.



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cc: All Parties (via email)