

From: [registrar](#)
To: [REDACTED]
Subject: CM: Letter of Comment - EB-2020-0246
Date: Monday, February 22, 2021 10:16:49 AM

From: Webmaster <Webmaster@oeb.ca>
Sent: Thursday, February 18, 2021 3:09 PM
To: registrar <registrar@oeb.ca>
Subject: Letter of Comment - [REDACTED]

The Ontario Energy Board

-- Comment date --
2021-02-18

-- Case Number --
EB-2020-0246

-- Name --
David Enns

-- Phone --
[REDACTED]

-- Company --

-- Address --
[REDACTED]

-- Comments --

We own a seasonal property that is subject to this proposed change. As a retired economist, I can appreciate the OEB's interest in wanting to ensure that HON's distribution costs are allocated to best reflect its actual delivery costs, however, not enough research has gone into this proposal.

I say this because at our permanent residence, our electrical provider is Fortis and we are charged \$0.1646/kWh for the first 542 kWh and then \$0.1297/kWh for any balance plus HST. We pay no separate delivery charge.

Their delivery costs are included in their rate per kWh.

As you know, this Fortis rate compares with our HON rate of \$0.128/kWh that is exclusive of any delivery charge.

Our delivery charge, as one example, was
\$103.74 for the month of August 2020.

Why is there such a difference in cost for electricity within the same province? Why is Fortis so much more efficient than HON?

As A. Kellogg wrote in his damming book "Transforming Power: The politics of Electrical Planning" about Ontario Hydro (before its breakup in 1998), "its sheer size would have made it slow to change its course" p. 129 and (my words) being the monopoly it is, it never has actually changed.

The OEB should delve into the complete cost structure of HON and not just tinker. For example, a portion of its distribution costs will of course reflect the extremely generous salary and fringe benefits (I understand it has the best pension plan in Canada) of its employees. Don't simply assume that its delivery costs should be as high as they are. Can they not be reduced?

The C.D.Howe Institute recently (October 30, 2020) pointed out how expensive Ontario's electricity costs were compared to other provinces - see "Power Consumers Face Widely Varied Costs Across Provinces". They pointed out power costs are almost double in Ontario for business compared to Quebec. Why is this so?

This proposal is, quite simply, inadequate.

-- Attachment --