

From: [seasonalrateclass](#)
To: [REDACTED]
Subject: CM: Letter of Comment - EB-2020-0246
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From: Webmaster <Webmaster@oeb.ca>
Sent: Thursday, March 4, 2021 11:51 AM
To: registrar <registrar@oeb.ca>
Subject: Letter of Comment - [REDACTED]

The Ontario Energy Board

-- Comment date --
2021-03-04

-- Case Number --
EB-2020-0246

-- Name --
shawn hyland

-- Phone --
[REDACTED]

-- Company --

-- Address --
[REDACTED]

-- Comments --

-- Attachment --
https://www.oeb.ca/sites/default/files/uploads/comment-form/OEB%20letter_0.docx

Hydro One/OEB

Sir/Madame

As a former Hydro One employee and cottage owner on Nine Mile Lake in Township of Muskoka Lakes I'm interested to hear the specific explanation surrounding the abolition of seasonal billing. I believe that large urban blocks and industrial users, as well as the Ontario government, have offset the cost of seasonal revenue but to remove the rate class wholesale would not reflect your own long standing policies of conservation. The argument that maintenance costs are higher in seasonal areas and therefore rates must be adjusted is a weak one at best. Certainly those costs are more expensive but the reality is that maintenance of utility infrastructure in seasonal settings is woefully lacking or simply not done. As an example I offer this. My cottage is serviced by a single phase primary line that cuts through the middle of the property. The transformer pole is a 1960 - 40 foot eastern cedar that has been banded multiple times under the R2 replacement program. The synthetic bands have all rotted off and the pole never changed even though it has been deemed too dangerous to climb. I have no doubt this is not a one off. Further the poles along Muskoka Road 13 are all circa 1970 and haven't been replaced unless severely damaged even though the average lifespan for treated pine poles is 40 years. I realize too, there is a forestry component factored in to the rate structure but the original 7 year clearing cycle along right of ways has long gone by the wayside. It may be 10/12 years or better for line clearing in our part of the province. Again I don't think this situation is an anomaly. At present the surcharge for delivery is 2 or 3 times what the consumption is for the bulk of cottage customers. Hydro One and the OEB have both preached conservation for many years yet now you are proposing a substantial rate increase to the

same people who are the lowest consumers. No doubt urban customers, coupled with industrial customers, provide you with your greatest revenue stream but they also represent the lowest maintenance/infrastructure costs. It now seems that you are willing to penalize the very people that followed, albeit without choice, your guidelines. Reliability is an issue for rural customers, not so for the urban users. Outages in rural areas range from hours to multiple days. This would not be tolerated in an urban setting. Paying for less reliability seems counterintuitive. We use less and the system is less reliable but you want us to pay more. This sales model would simply not work anywhere in the business world. If revenue streams are the end product of this class change perhaps you should consider other options such as extending peak hours or buying back generating stations sold to foreign investors. The government and Hydro One have made multiple mistakes in the past such as paying 60 to 80 cents per kilowatt hour to individuals for green energy then selling it for 8.5 cents on the grid. That was not a consumer choice but one made at higher levels and should be addressed by you before abolishing the current rate structure. The Ontario consumer has paid off Hydro One's stranded debt at least twice and the Ontario government then abused those millions of dollars by using them to offset infrastructure costs. There was no transparency here. How do you/they reconcile the overreach? Perhaps I am taking this situation to its lowest common denominator or simply do not understand how the OEB works but in my opinion there are a number of glaring questions that both the company and you as its governing body need to address before suggesting the lowest consumer cover your mistakes. Certainly everyone can and should expect modest increases from time to time to reflect the current and ever changing situations be it with food, fuel or energy charges but a one

hundred percent rate increases on the backs of low end users is beyond the pale. This can and should be done in other ways.