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From: Webmaster <Webmaster@oeb.ca>

Sent: Tuesday, March 9, 2021 4:18 PM

To: registrar <registrar@oeb.ca>

Subject: Letter of Comment - [REDACTED]

The Ontario Energy Board

-- Comment date --

2021-03-09

-- Case Number --

EB-2020-0246

-- Name --

Innes Martin

-- Phone --

[REDACTED]

-- Company --

-- Address --

[REDACTED]

-- Comments --

Please see attachment

-- Attachment --

<https://www.oeb.ca/sites/default/files/uploads/comment-form/OEB%20submission.docx>

- The OEB's findings quote "The OEB has found that the distribution rates currently charged to seasonal customers do not appropriately reflect the cost to serve them" is absurd and unsupported as there is no quantifiable data to support this statement. Hydro One and its predecessors have never tracked the costs of serving customers by rate class. So to claim to have that data to make a decision is a complete fabrication unless you have tracked and continue to track O M & A costs by rate class of all customer.
- Two of the significant O M & A costs of servicing customers are, one the travel distance from the work centre to the customer regardless of rate class and the second is the customers distance from the substations. The further you are from the source dictates the amount of line required to provide service. Neither of these major factors are considered in rate classification. A seasonal customer may be closer to the work centre and the substation than clusters of UR and R1 customers. In Northwestern, Northeastern, the Near North and the Ottawa Valley this occurs on a regular basis as small towns (R1) are distributed randomly. Look at Bare Point DS and the feeder east along the lake. Hundreds of seasonal and homes mixed together with narrow lots for kilometres all within a short distance of Bare Point substation. Google it.
- In large parts of Western, Southern and Eastern Ontario farms occupy a large portion of frontage on main and secondary roads. I speculate that the kilometres of line to feed these customers is significant has not been fairly assessed in Hydro studies compared to Residential and Seasonal. Just go onto Google Earth and browse.