

[REDACTED]

From: Webmaster <Webmaster@oeb.ca>
Sent: Sunday, March 14, 2021 9:10 PM
To: registrar <registrar@oeb.ca>
Subject: Letter of Comment - [REDACTED]

The Ontario Energy Board

-- Comment date --
2021-03-14

-- Case Number --
EB-2020-0246

-- Name --
Stanley Ford Ralph

-- Phone --

[REDACTED]

-- Company --

-- Address --

[REDACTED]

-- Comments --
Please refer to the attached submission.

-- Attachment --

[REDACTED]

March 12, 2021

SUBMISSION TO ONTARIO ENERGY BOARD

RE

THE ELIMINATION OF HYDRO ONE NETWORKS

SEASONAL RATE CLASS (EB-2020-0246)

- I have just recently received Hydro One’s letter dated February 19, 2021 informing of the decision to eliminate the Seasonal Rate Class (SRC)
- I note from this letter and from the OEB’s website that “The OEB has stated that it will not reconsider the decision to eliminate the Seasonal Rate Class in this hearing”
- I further note that the OEB’s decision was a result of Hydro One’s rate application of six years ago in 2015 where the OMB found that “The OEB has found that the distribution rates currently charged to Hydro One’s seasonal customers do not appropriately reflect the cost to serve them. In other words, some seasonal customers are paying less than they should be and others are paying more than they should be”
- Although the OEB has made a decision that it will not reconsider the decision to eliminate the Seasonal Rate Class, I wish to appeal and have this decision reviewed and reversed for the following reasons:
 - To the best of my knowledge (and I grant that it is possible that I am incorrect on this) no specific and personalized notice was given to seasonal ratepayers that the elimination of the Seasonal Rate Class (SRC) was going to be an issue in the 2015 rate application
 - Given that the decision to consider elimination of the SRC would impact this specific segment of Hydro customers only, why did neither the Board nor Hydro One not contact these particular consumers directly via mail to give them the opportunity to intervene (again, I could be incorrect on this assertion but I do not believe so)
 - The Seasonal Rate Class was established historically for a purpose. What evidence was considered by the Board to determine if the original purpose still was valid?

- One could question whether, relative to a public service, a certain class of remotely located customers should be charged full cost for the services they received (e.g. are rural post office customers charged extra by Canada Post to receive their mail? Are rural citizens charged mileage if OPP are called to their residences?)
- Given the very short notice given to consumers to input into this matter and in the interests of fairness, transparency, and above all “due process” I would again request that a public hearing with adequate notice to all affected ratepayers be held by the OEB to reconsider the decision to eliminate the SRC.
- Should the OEB decide that it does not wish to hear directly from ratepayers on the decision to eliminate the SRC but intends to proceed strictly with an implementation hearing, I would offer the following comments:
 - Customers currently in the SRC class are facing as much as 100% increases in their hydro costs (taken from the table accompanying the Hydro One letter of February 19th)
 - My belief would be that the vast majority of seasonal customers would be moving to the “Residential Low Density (R2) Class” and would be subject to double digit price increases
 - The consumer price index has been running at a rate of in the order of 2% to 4% over the past few years so the proposed hydro rate increases are completely disproportionate to the overall cost of living increases in the province
 - Many seasonal ratepayers are retirees on fixed incomes with non-inflation adjusted pensions and those who are working are not receiving cost-of-living allowance increases due to the state of the economy
 - There surely must be a way to spread the increased cost of servicing seasonal residents over the entire rate base (as the Post Office does) as opposed to requiring them to absorb exorbitant cost increases when their incomes are basically fixed. **Simply put, where is the money going to come from to allow these folks to pay the increased rates?**
- Obviously, if the OEB elects to take the position of “damn the torpedoes – full speed ahead”) then very serious multi-year mitigation procedures should be implemented.

I would appreciate being registered as a participant for the hearing.

Yours truly,

Stanley Ford Ralph

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