

[REDACTED]

---

From: Webmaster <Webmaster@oeb.ca>  
Sent: Sunday, March 14, 2021 10:42 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 --  
Rick Szymczyk

-- Phone --  
[REDACTED]

-- Company --

-- Address --  
[REDACTED]

-- Comments --

[REDACTED]

March 15, 2021

To: Ontario Energy Board  
Cc: Ontario Government  
From: Rick Szymczyk, P.Eng, MBA



Re: **EB-2020-0246, EB-2019-0234, EB-2016-0315**

As a seasonal ratepayer serviced by Hydro One, I hereby request OEB review my comments as a private citizen and stakeholder in the Province of Ontario's Electrical Distribution System. In accordance with the Ontario Energy Board Act, 1998 Section 1, I submit that the OEB, through its approval and method of implementation that plan to Eliminate the Seasonal Ratepayers by Hydro One Effective Jan. 1, 2022 is in direct contravention of the Act. I further request, respectfully, an opportunity to present as intervenor in regards to this application. My rationale follows:

As known to the OEB, there exist two separate and unique 'classes' of Electrical Utility customers in Ontario, one the OEB refers to as Class A customers comprised of generally large industrial & commercial enterprises that consume Megawatts of Power. For simplicity, I will call Class A customers the 'Wealthy'. The remaining referred by OEB are Class B customers, generally individual property owners, small business and in the context of my letter, seasonal (individual) property owners. For simplicity, I will call this group of Class B customers 'The Majority'.

For over 10 years now, the Class A (Wealthy) have been allowed to pay for the vast majority of their electricity by simply reducing their Power consumption during the (five) days per year out of 365 allowing this privileged class of customer to reduce total electrical costs by up to 80%. This golden opportunity is possible through a very complex rate structure commonly known as the 'Global Adjustment Charge' known well to many large, 'Wealthy' consumers.

The Class B group (the majority) has received no such benefit and is instead prohibited through OEB policy from receiving any such incentive and forced to pay, under the threat of disconnect from service due to ever increasing price hikes apparently to pay for the benefits received by the Class A (Wealthy) customers. The numbers are not trivial as Billions are paid out annually to large 'Wealthy' customers while the majority were required to pay or, like many, completely cut off from electricity if they failed to comply with rate increases.

The current situation cannot be explained through lack of technology. Indeed, small scale curtailment and renewable, distributed energy can be deployed virtually anywhere. Further, Smart Metering technology previously mandated by OEB and paid for by ratepayers is available to all customers enabling virtually any rate structure.

The University of Western Ontario's Ivey School of Business offers more detail below:

<https://www.ivey.uwo.ca/cmsmedia/3787293/dont-leave-me-stranded-what-to-do-with-ontario-s-global-adjustment.pdf>

The OEB, by granting Hydro One's application is grossly inequitable to most ratepayers, mainly the 'Majority' of people that subscribe to Class B service and is in contravention of at least two Ontario statutes from the Ontario Energy Act (1998) including:

**#1 Section 1 (1) of Ontario Energy Act: *To Inform consumers and protect their interests with respect to prices.***

How can the OEB claim compliance with Ontario Energy Act when the majority of customers pay higher prices than the wealthy, Class A customers who can pay less? Further, OEB has a fundamental duty to inform ratepayers that other classes of customers receive vastly different rate structures that enable significantly lower rates and/or methodology to calculate.

**#2 Section 1 (3) of the Ontario Energy Act: *To promote conservation and energy management in the province of Ontario... including having regard to the consumer's economic circumstances.***

By mandating a rate structure that rewards the 'Wealthy' who receive highly subsidized electricity paid for by the 'Majority', the only reasonable explanation is that OEB intentionally mandates policies & approves applications that specifically benefit the Wealthy.

It is apparent that OEB has an interest in supporting policies that benefit only the Class A (Wealthy) because solutions exist for both Class A and Class B consumers through distributed energy and conservation that enable meaningful improvements that reduce pollution. Current OEB policy, supported by this application, is not only financially regressive and contrary to Ontario Energy Act, but also irresponsible because it promotes increases in consumption and resulting pollution that, absent its policies, such consumption would not normally occur.

The OEB, by granting the request by Hydro One will perpetuate a previous decision by the OEB that prevents the 'Majority' from receiving same opportunity for incentive to reduce energy use and improve efficiency. Indeed, if this policy is approved in its current form, more Class A Customers can be expected to invest in technology for their benefit resulting in even further cost increases for the 'Majority' of customers in the future while the majority is prohibited. Indeed, at the time of writing, almost all of the 18 applications currently before the OEB initiated from Electrical Utilities involve price increases paid for by the Majority, a confirmation that utilities can expect continued support from the OEB to distribute corporate welfare to Wealthy recipients that only makes the largest and richest even richer at the expense of the majority.

The Electrical Utility file has recently been termed 'complicated' by Ontario's political leadership. I believe the answer is much simpler. The OEB must ensure a level playing field for all customers including seasonal ratepayers referenced in the application, regardless of their wealth and/or scale of operation a requirement under the Ontario Energy Act. Such a move would not be inconsistent with the OEB's previously announced decision to move seasonal ratepayers to residential rate classes.

Indeed, the vision that Sir Adam Beck, originator of Ontario Hydro, promising Electricity to Ontarians at cost is further away than it ever has been and will continue to do so if this application is approved as requested.

Nothing less than the viability of the Ontario Energy Act and OEB's privilege of administering the monopoly over electricity in Ontario is at stake.