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From: Webmaster <Webmaster@oeb.ca>
Sent: Monday, March 15, 2021 3:35 PM
To: registrar <registrar@oeb.ca>
Subject: Letter of Comment - [REDACTED]

The Ontario Energy Board

-- Comment date --
2021-03-15

-- Case Number --
EB-2020-0246

-- Name --
Norm Brown

-- Phone --
[REDACTED]

-- Company --

-- Address --
[REDACTED]

-- Comments --
See letter attached

[REDACTED]

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March 15, 2021

To: Ontario Energy Board

From: Norm Brown

[REDACTED]

[REDACTED]

[REDACTED]

Re: Elimination of Seasonal Residential Class

What on earth is going on!!!

The three page letter I got from Hydro One makes no sense, from what one would consider is a simplistic job of eliminating Seasonal Residential Class. I would expect that I would simply be moved into low density class as my neighbor is. I am in a low density zone (R2) which has rural or remote rate protection credit of \$60.50 applied to the monthly service charge with the distribution volume charge capped at \$36.86. The definition under "How classes are assigned" would need to be amended to remove "year round residences", or amended in some other fashion so as to include the nature of my occupancy since I currently do not qualify as a year round residence (see website <https://www.hydroone.com/rates-and-billing/density-review-and-service-type-information>).

But no it is not that simple. Hydro One has prepared a 232 page report entitled "Hydro One Report on Elimination of the Seasonal Class" (October 15, 2020 Update EB-2016-0315)(here in referred to as the report).
https://www.hydroone.com/abouthydroone/RegulatoryInformation/oebapplications/Documents/HONI_Appl_Updated_Seasonal_Report_20201015.pdf

That's 53 pages of text and charts and 179 pages of charts and graphs. In that report there are statements that allude to the complexity of simply removing a column under residence density class. Also there are statements that reveal current rate protection subsidies that are available to R2 customers (\$60.50 off monthly service charge) that won't be available to seasonal residents moving into R2....the density class I live in with my neighbors. Where did that come from and why would I be discriminated against not to receive a subsidy that my neighbor has?

As well, in the report is a reference to direction by OEB that **"After its March 12, 2015 Decision to eliminate the Seasonal Class, the Board issued a new policy on April 2, 2015 under proceeding EB-2012-0410 requiring that all utilities move to an "all-fixed" distribution rate for residential classes starting in 2016.** " This move is referred to in the 3 page letter "Hydro One is also including the bill impact due to completing the ongoing transition to all-fixed electricity distribution rates." That's it for explanation! Flip the page and there's a chart with a bunch of meaningless numbers in columns that show huge increases for customers moving to R2, but minor to major reductions for customers going to

R1 and UR. The example calculation is of NO assistance as it seems to summarily and arbitrarily add a bunch of meaningless numbers together. We are asked to “trust” this representation without a decent explanation of how these numbers relate and how they were arrived at. In my case they add the status quo \$54.06 (what it is projected that I’d pay for 50 kwh under seasonal residential??) then add some mysterious \$6.28 for all-fixed rates (funny that “all-fixed rates” are different depending on energy consumption.....isn’t that variable rate????) then add another mysterious \$53.79 because I am moved to R2. My cost of hydro doubles and I’m not even using much! To reiterate **“WHAT ON EARTH IS GOING ON!!!”**

Hydro One in the report refer to numbers of seasonal customers affected broken out by class they would likely be assigned to; 245-UR; 69,839-R1; 77,595-R2 for a total of **147,679**. Despite the numbers Hydro One uses and the uncertainty as to how they were arrived at, seasonal customers moving to R2 are by far the most affected by these proposed changes. That’s 69,839 of Hydro One’s 1.4 million customers. Doubling the bill for 5% of Ontarians using minimal electrical energy cannot be what the OEB or the Ontario Government is considering....is it?

At page 9 of the report their chart indicates that 18,503 seasonal residential customers use in excess of 800 kwh per month. That’s 12.5% of customers currently classed seasonal residence that use the same or more energy than many R1 or R2 resident classes I suspect. I personally know many that use less than 800kwh per month. One interesting observation is how can a residence in high density urban be a seasonal residential...except by definition in Hydro One policies. Is the issue not looking at how the classes are defined rather than simply eliminating seasonal residential?

As a matter of fact, my hydro is turned on all the time to maintain service to certain electric appliances that operate in maintenance mode. I do NOT shut off my main breaker to disconnect all electricity, but my consumption is less than when I am there. A situation that is very similar to a person going on vacation or spending 6 months of the year in Florida for example. I do NOT see myself as a seasonal user of hydro energy. I use hydro energy as I need it on a year round basis.

While it appears that Hydro One is trying to deliver what OEB and the Ontario government has asked for, the 3 page letter they sent out and the 232 page report strikes me as smoke and mirrors. The letter seems to want to incite affected customers to oppose the move. The report contains a preponderance of numbers and graphs which to the lay person overwhelms to the point of being useless. I trust that is not the case with OEB’s understanding. I understand your mandate is to ‘make(s) decisions and provide(s) advice to the government in order to contribute to a sustainable, reliable energy sector and to help consumers get value from their natural gas and electricity services.’

Hydro One and predecessor Ontario Hydro have anecdotally been considered an egocentric corporation with staff raised in a culture of entitlement. Please ensure that Hydro One earns their place in a stable reliable energy sector, and not at the price of consumers not getting value.

I am opposed to any increase in my hydro bill as it would relate to elimination of the seasonal residence class.

Regards

Norm Brown