

[REDACTED]

From: Webmaster <Webmaster@oeb.ca>
Sent: Monday, March 15, 2021 5:01 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 --
Susan Farris

-- Phone --
[REDACTED]

-- Company --

-- Address --
[REDACTED]

-- Comments --

I agree with the decision to eliminate the Seasonal rate class, but vehemently oppose the proposed 100+% delivery charge increase for the 78000 customers like me who will be move to the R2class. My scathing assesement of the methodology is attached.

-- Attachment --
[REDACTED]

RE: OEB file # EB-2020-0246 concerning elimination of HydroOne's Seasonal Rate Class

To the OEB and Whom it May Concern,

I am a retired, widowed American with a cabin in northeast Ontario, in the Lorrain Valley bordering Lake Temiskaming. I happily support the Canadian economy through taxes and consumerism, and have always been impressed by Canada's attitude of putting people first. Not so, today.

I am in the seasonal class that will move to R2. We deliberately built our cabin to be very energy-efficient, and my usage averages less than 30KWH/month. It has been 0 since October 2019, due to covid-related border closure (while I am still paying hundreds in delivery charges—an issue for another day). Your proposed plan to eliminate the seasonal class, whichever form it ultimately takes, is grossly unfair to customers like me, who will be paying \$1200. delivery cost annually for \$40. of electricity. Think about that. Worst-case scenario customers do exist, and there are 78000 of us-- enough for you to get this right.

I'm sure I am considered an "expensive" manual-read customer—ironic because my cabin sits on a year round road that leads to a Hydro plant—at least twenty Hydro vehicles speed past my driveway daily. In reality, delivery to me is exactly the same as my neighbors across the road, whose rural residential delivery charges are capped at \$442. annually. Our poles are less than 50 feet apart. The RRRP and DRP subsidies are not available to me. The 10% mitigation helps in the short term, but at the end of the proposed 8, 9, 10 or 12 year phase-in I will still be paying an unfair share. Part of that cost is blamed on manual meter reading, which will likely be moot much sooner than that, as broadband access is expanding exponentially in the province. It is hard not to feel that our class of 78000 is being singled out as low hanging fruit to subsidize year round power for the other 5M households in Ontario. You are right to reduce the number of rate classes--simplicity is economically efficient. However, the term "all fixed rate" should not be used—it is misleading. Our class of conscientious low users will be "fixed" at a rate far above everyone else's.

Those are the facts— now here's what I think, and you deserve this. It is not like me to be this bold, but I fear others in the group may be too polite to say it, so here I go. Before I retired, I was a corporate CEO, so I naturally look at issues through that lens. As a public agency, your responsibility is to me. The bottom line is that you apparently need to generate an additional 50M revenue per year. As of the 2016 census, there were 5.1 million households in Ontario. Your plan is to shift the cost of this need to those who benefit least, and with the least clout- a small class of "out of sight out of mind" consumers. I've read your report--this 200 page data dump might make for a decent collegiate thesis but should be an embarrassment to whoever commissioned it. Raising the monthly delivery charge to each Ontario household by a dollar a month would get you there, end of discussion and move on. You are applying rocket science to a grade school math problem and consumers will pay the administration cost for years to come. Quite frankly, the unfairness of the plan, plus its bloated potential administration cost, clearly opens you to public censure, if not class action. I'm so mad I'm tempted to take it on myself. The costs to administer this unnecessarily complex plan is imprudent and ultimately costs all consumers.

If my employees had submitted this as the method to generate 50 M annually from 5 M customers, I would have fired the whole bunch long before five years had elapsed between the question and the answer. I have witnessed overjustification of ideas in my years of business experience, and it is usually politically motivated—create an overly-complex justification for someone's pet project to obscure the simple fact of the idea's unfairness, when exposed to the light of day. I would hope that at least one of you would give your head a shake to clear the cobwebs and ask the simple question—what the hell are we doing? It would be embarrassing for you all to chuck the whole thing at this point but clearly that is what you need to do before you mire yourselves deeper into this crazy scheme, with its years of unnecessarily bloated administration and minutiae.

I have taken the following phrases from the OEB home page—they are your mission and mandate- *We make rules to protect you. We make rules to ensure that customers are treated fairly. Mission and mandate—look out for consumers interests. Demonstrable consumer value. Strengthening and sustaining confidence of consumers.* Have you done your job?

I will close with the question I asked myself each time my company was faced with a momentous choice—what if it was me? If your utility rate structure was to be changed as mine will be, would you stand for it? Does it meet the standard your mission states as your mandate, in your responsibility to me and my fellow class members? If not, please be bold and make a decision that is right, simple, prudent and will stand the test of time. Please feel free to contact me if you have any questions.

Respectfully,

Susan Farris

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March 15, 2021