

From: [seasonalrateclass](#)
To: [REDACTED]
Subject: CM: Letter of Comment -EB-2020-0246
Date: Thursday, March 18, 2021 9:12:59 PM

From: Webmaster <Webmaster@oeb.ca>
Sent: Sunday, March 14, 2021 8:07 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 --
randy miller

-- Phone --
[REDACTED]

-- Company --

-- Address --
[REDACTED]

-- Comments --
Please accept my attached letter for consideration on the hearing.

-- Attachment --
<https://www.oeb.ca/sites/default/files/uploads/comment-form/Hydro%20letter%20March%2014%202021%20changed%20to%20residential%20classification.pdf>

March 14, 2021

To: Ontario Energy Board

Re: Seasonal Rate Class (EB-2020-0246) Hearing
Randy Miller [REDACTED]

I am writing to outline my objection to the seasonal rate class being changed to a residential class. This would also include the difference in between the different rate classes and subsequent rate increase/decreases. I am currently considered in the R2 Class.

I am amiss as to why the seasonal class is being eliminated since all homes in a seasonal location are of similar status. These are temporary used locations whether it is in the north or south and would probably have similar usage for similar types of dwellings. I would think that the only difference would be the high energy use dwellings. It is my opinion that the seasonal classification should remain as such since they are all similar in status and usage. Another option is that the R2 and R1 designation could remain as seasonal and the higher populated areas (urban) could be changed to residential.

From the proposed cost list, the more usage, the lower the rate increase, which contradicts society to use less energy. As well, the person who only uses their dwelling 4 months out of the year and less energy is penalized from the dwelling who uses their dwelling longer and uses more energy.

I am also concerned on the proposed different rate classes where the R2 classification can be subject to a 100% increase and an urban classification can see their rates decrease by 44%. In my opinion, the difference in increase to decrease per classification is astronomical and should not be allowed. These are all seasonal locations. I would question why there is such a difference in proposed rates (ie maintenance etc...). Since the lines have been previously installed, I would assume that it would be a maintenance issue?

If maintenance calls are the issue, I am assuming that the percentage of calls vs the number of seasonal locations would be similar in scale. I would think that the number of calls would be minimal for an R2 classification as oppose to an Urban classification. From my re-recollection, it appears that our area rarely has very many calls or issues which should reduce the amount of maintenance costs.

I understand that there are less seasonal homes in an R2 class, and subsequently less revenue. However, it appears that the lower R2 class is being unfairly discriminated against due to their location and population. Subsequently they are being targeted with extremely higher rates to offset the urban costs.

I am assuming that most seasonal homes in an R2 location are in smaller areas and probably do not have the higher end seasonal dwellings that the larger urban areas have. The extra costs targeting the R2 locations may have an effect on the ability for them to pay the higher fees.

It should also be noted that our standard flat fee, whether the seasonal location is being used or not, is over \$40 a month. This amounts to \$120 every quarter (ie. billed quarterly). Should this not be taken into account when reviewing the changed to residential as well as class determination and subsequent increase/decrease in rates.

It is my strong opinion that the classification should remain as seasonal since these are seasonal locations and not considered residential. As well, the fact that there is such a discrepancy in proposed rates being increased/decreased is way too high and should not be allowed. There should be consideration to change the highly populated areas to residential and the R2 and R1 to remain as seasonal.

Sincerely,

Randy Miller