

From: [seasonalrateclass](#)
To: [REDACTED]
Subject: CM: Letter of Comment - EB-2020-0246
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From: Darren Wiebe [REDACTED]
Sent: Wednesday, March 10, 2021 3:41 PM
To: registrar <registrar@oeb.ca>
Subject: EB-2020-0246

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Attention: Board Secretary

I hope you are well. To summarize. The elimination of the seasonal rate class relates to charges for the distribution services that Hydro One provides. The distribution rates currently charged to seasonal customers do not appropriately reflect the cost to serve them. Distribution or delivery charges are for building, maintaining and operating the electricity infrastructure. I believe that rate mitigation is required.

Seasonal customers choose to spend only part of the year at a seasonal residence. This choice is often made for budget purposes as electricity is expensive in Ontario. Seasonal customers consume less electricity and thus put less strain on the electricity infrastructure than non seasonal customers. Seasonal customers produce fewer greenhouse gas emissions from electricity generation. Even when they are not consuming electricity, they are still charged for delivery. On average it accounts for 91% of my total Hydro One billings even when electricity usage is zero. Seasonal customers subsidize non seasonal customers by paying for the delivery of electricity that only non seasonal customers use. Similarly, seasonal customers subsidize heavier non seasonal polluters.

Seasonal customers who burden the electricity infrastructure the least will be penalized the most as reflected in both the all fixed rate and R2 class changes. In other words, those who have the smallest footprint will be corrected the biggest. Low using seasonal customers will essentially subsidize users who receive all fixed rate, R1 and UR class rate reductions with R1 and UR customers becoming the greatest recipients. This will effectively be a redistribution of funds from the lowest to arguably the highest users. The lowest users are the low hanging fruit that Hydro One appears to be targeting. It should be simple. If you use more, you pay more as reflected in both delivery and usage. Many

customers of all classes, but in particular non seasonal customers can afford to pay more, some with very large and elaborate residences as opposed to seasonal customers with smaller, traditional cottages. In this regard, seasonal customers are the stewards of the environment and should be incentivized to continue as such, not penalized. Distribution or delivery relates to primary lines only. Seasonal customers would still bear the full cost of maintaining and operating secondary lines.

Finally, since the OEB serves the public interest, how was it decided that it will eliminate the seasonal rate class? Was there a public hearing? Eliminating the seasonal rate class altogether implies that recreational properties of the seasonal variety will no longer be an option for Ontario residents as they relate to electricity usage. I am not sure how this makes sense when many people simply want to enjoy the seasonality of say cottage country and not be forced to incur heavier delivery and electricity charges.

I appreciate the opportunity to provide my comments. I look forward to the OEB's hearing and the results that will come from it.