

From: [registrar](#)
To: [REDACTED]
Subject: FW: OEB EB2020-0246 Elimination/Implementation Hydro seasonal rate change
Date: Monday, May 31, 2021 4:46:15 PM
Attachments: [May 31 2021 letter to OEB EB2020-0246.docx](#)

From: Lubitsa Papakostantinu [REDACTED]
Sent: Monday, May 31, 2021 3:06 PM
To: registrar <registrar@oeb.ca>
Subject: OEB EB2020-0246 Elimination/Implementation Hydro seasonal rate change

Please see the attached letter with feedback to the Hydro One April 26 response and comments on the implementation of the Seasonal rate change.

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Lubitsa Papakostantinu

May 31, 2021

Ontario Energy Board
2300 Yonge Street
Toronto, ON M4P 1E3

File#: EB-2020-0246

Subject: OEB Decision to Implement/Eliminate Hydro One Seasonal Rate Class

To Whom It May Concern,

The first part of my letter is with respect to the Hydro One April 26, 2021 response to OEB.

Attached are Hydro One Networks Inc.'s responses to the questions identified by the Ontario Energy Board in the Procedural Order No.1 issued April 12, 2021 with my feedback in red.

Hydro One's main service is to deliver electricity to seasonal customers' properties. Delivery of electricity to seasonal customers includes use of the high voltage transmission system, for transporting electricity from generation facilities to local transformer stations, as well as use of the low voltage distribution system to transport electricity from a transformer station to customers' properties. As part of delivering electricity Hydro One also provides meter reading, billing, account maintenance and other customer services. Hydro One also provides seasonal customers with access to the distribution system if they intend to generate their own electricity and use the distribution system to inject any electricity that is in excess of their own personal needs.

My Feedback:

It is interesting that Hydro One does not list ensuring electricity is available as their main service item. No one is disputing the administration costs Hydro One has listed. These apply to all customers regardless of their classification. It does not alter the fact that these services remain regardless of live service existing so a suspend/restore service for seasonal customers is an option. Other utilities have provided a suspend/restore service for years to seasonal customers and no they do not remove the infrastructure and then put it back in.

The distribution rate subsidies available to year-round residential customers will not apply to seasonal customers when they are moved to their new rate classes, as discussed in the response to question 10.

My Feedback:

If we are being billed as residential then we should be given the same subsidies. If not allow us the option of a suspend/restore service and that means we don't pay for the time we are out of service.

When customers are not using their cottage, their cost for electricity used will be either low or nil, depending on what arrangements are made to manage their electricity use when they are not there. However, the equipment (wires, poles and transformers) necessary to deliver electricity to customers remains in place year round. The cost of having the distribution equipment available to deliver electricity to customers is largely fixed and independent of the actual amount of electricity consumed by residential customers, and therefore is a cost that Hydro One incurs even if a customer chooses not to use their seasonal property for certain periods of the year.

My Feedback:

I didn't think anyone was still trying to use these outdated monopoly statements to justify why they are refusing to acknowledge the fact they will never change unless forced to do so. Utter nonsense. All other utilities service is there also. If we use it we pay all of the normal charges. If we don't use it we do not pay. It is called suspend/restore in telecommunications lingo and lock/unlock in gas lingo.

The first is that year round R2 residential customers are eligible for a \$60.50 per month RRRP subsidy that will not apply to seasonal customers moving to that class, as discussed in the response to question 10.

Hydro One will not profit from the elimination of the seasonal customer class. At the time the seasonal class is eliminated, Hydro One will reset the rates for all of its customer classes so that any additional revenues coming from those seasonal customers moving to the low density R2 residential class will be fully offset by a reduction in the revenues collected from Hydro One's other customer classes.

It is estimated that over the nine years that mitigation credits are potentially required, a total of \$150 million in mitigation credits would be paid out to seasonal customers in the R2 residential class. Hydro One is proposing that the cost of the mitigation credit be recovered from customers in all classes given that customers in all classes benefit from lower rates as a result of the increased revenue collected from seasonal customers moving to the R2 residential class.

My Feedback:

So I guess the above just cements the fact that seasonal customers will be paying more and no one cares. I thought we had learned our lessons in the monopoly telecommunications wars. It is so painfully obvious this is just a money grab – oh no it's a rate change but everything else stays the same.

While I am not pleased with the decision to eliminate the seasonal rate category, as you have stated it is now done.

My thoughts on implementation:

-It is discriminatory to bill me as residential but deny me the subsidies/privileges of a residential class. Change the rules.

-It is discriminatory to refuse to implement a seasonal suspend/restore service for seasonal customers. How simple. Allow it to happen. We pay for all the service when we use it at the much higher residential rates you just moved us to. No we do not pay for anything when it is suspended. We all know the higher rates will offset whatever money Hydro One will say they are losing for service that is not working anyway. If the other utilities can do a suspend/restore service why can't you tell Hydro to do it? If we do not wish to suspend the service we will continue to pay the ridiculous administrative charges for a service we are not using without any kind of compensation when the power outages occur.

-Stop playing the monopoly card and realize those days are long gone. Refusal to adapt to the times will result in ongoing complaints towards OEB and the utility.

-We will not be aware of the significance of the impact to our billing until our bills are received. Kindly ensure that we are allowed to make payment arrangements, without late payment/ credit bureau impacts during the transition period.

-If you will not force a Suspend/Restore service for seasonal, kindly consider allowing equal billing arrangements for the administrative discriminatory charges we will be forced to continue to pay for service we are not using.

In Closing

I am optimistic that someone will see how upset we are with the callous approach taken towards me and others in this position. We have no issue in paying for what we use. I draw the line when I have to pay for Hydro's overhead when I am not using the service. Perhaps it is also time for Hydro One to be forced to credit us for time the service is not working due to their inability to bring power to my home. I guess I still do not have the ability to comprehend how if the lines/power is always on, as Hydro states it is, why it doesn't allow work inside my home? I believe they stated that is why I have to pay for service I never use.

I just wish I was a monopoly.

Respectfully,

L. Papa

