

Hydro One Networks Inc.

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BY EMAIL AND RESS

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August 27, 2021

Ms. Christine E. Long
Registrar
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Long:

Re: EB-2020-0246 – Implementing the OEB’s Decision to Eliminate the Hydro One Networks Inc. Distribution Seasonal Rate Class

I refer to the August 22nd letter sent to the Board by Sunset Shores Peninsula Association (“Sunset Shores” or “the Association”), in which letter Sunset Shores requested new orders from the Board regarding the implementation of the elimination of the Seasonal Rate Class of Hydro One Networks Inc. (“Hydro One”).

Hydro One responds as follows.

The orders requested by Sunset Shores are out of scope of this proceeding. P.O. #2 issued by the Board on May 26, 2021 states that there are two specific issues in this proceeding:

- (1) how to implement the decision to eliminate the seasonal class; and
- (2) for those who will be experiencing rate increases of 10% or greater a year, what is the best approach to mitigating these increases, exclusive of maintaining the seasonal class.

As part of this proceeding, Hydro One provided responses to a number of interrogatories to assist customers’ understanding of the density classification process as it relates to the elimination of the Seasonal Class, including specifically interrogatory Exhibit I-04-27, to which item a) of Sunset Shores’ request is related.

Sunset Shores, however, is seeking at this point additional detail specifically targeted at exploring and challenging Hydro One's density classification approach as it applies to its entire service territory. Sunset Shores' goals in that regard are indicated clearly throughout the Memorandum attached to the Association's letter. For example:

- (i) in paragraph 9 of the Memorandum, the Association is seeking to explore whether the boundaries undermine the Board's density guidelines, such that Sunset Shore should be allowed to access customer location and line data to "test and study" the scope and effects of Hydro One's approach to defining density zones.
- (ii) In paragraph 10 of the Memorandum, the Association is asking for the Board to ensure whether the density guidelines or their administration "are working in the manner intended."

Not only are the new orders requested by Sunset Shores out of scope of this proceeding, but they also seek to explore the general business processes and administration applicable across Hydro One's entire service area. If individual customers wish to question their density classification, their avenue is now, and has always been, to contact Hydro One's Customer Service team. In fact, on April 26, 2021, Hydro One responded as follows to one of the OEB's questions in P. O. #1 (underlining has been added now):

11. I believe Hydro One has incorrectly reclassified me into the R2 class. How do I get this corrected?

The mapping of seasonal customers to their new customer class was done based on the existing density-based residential class definitions (see response to question 9). Specifically, R2 customers are located in a low density zone defined as a geographic area that contains less than 100 customers, with less than 15 customers for every kilometer of power line used to supply energy in that area. If a customer believes that there is an error in the customer class they will be mapped to they can contact Hydro One customer service at 1 (888) 664-9376 and request that their reclassification be reviewed. We will review the mapping in question and either reconfirm the classification or make an adjustment if an error is found.

Item b) of Sunset Shores' letter requests access to Hydro One's software and data. Again, given that the goal of gaining access to the requested software and data is to test the general business processes and administration of Hydro One's density classification approach, that request and such access are out of scope of this proceeding. However, even if that were not the case, Hydro One responds that the software licence it has been granted does not permit Hydro One to allow use by third parties. Furthermore, the additional information would display personal customer information, contrary to privacy laws and the terms of Hydro One's distribution licence; and there are security concerns regarding the public release of the location and configuration of Hydro One's assets.

Therefore, Hydro One submits that the Board should not grant any of the new orders requested by Sunset Shores in the August 22nd letter.

Yours very truly,

A handwritten signature in cursive script that reads "Michael Engelberg". The signature is written in black ink and is positioned above the printed name.

Michael Engelberg

cc: Sunset Shores Peninsula Association, Attn: Mr. Lawrence Pick: larrypick@bbburn.com