

September 14, 2021

To: Ontario Energy Board,

Re: EB# 2021-0110

Letter of Intervention – Request for intervenor Status

Ice River Sustainable Solutions is a Canadian family-owned and operated company. For over 25 years, Ice River has produced environmentally responsible bottled water, but the company's focus over the past decade has grown to encompass sustainability and recycling innovations. We were the first beverage company in North America to operate a recycling facility in a closed loop – from curbside collection, to recycled bottle manufacturing, to fresh natural spring water products...and back again. We are a vertically integrated manufacturer, recycler, brand owner and innovator with 3 plastics manufacturing and recycling facilities, 3 water bottling facilities and our head office all based in Ontario. In addition to these facilities, we also have manufacturing operations in BC, Alberta, Quebec and Florida.

We have reviewed Hydro One's application for rate increases to cover various infrastructure costs planned for 2023 to 2027 (EB# 2021-0110) and we would like to express our concerns with these changes:

- **We already pay for infrastructure improvements or new installs and projects when we need them.** This happens within our businesses and on residential projects. New poles, connections, upgrades, etc. For example, in 2020 we opened a new facility in Shelburne, ON and paid over \$200,000 to Hydro One towards infrastructure.
- In 2017 we began the process of taking steps to reduce our global adjustment costs by installing an energy storage system (battery). This was a very slow and difficult process to get through and once we were ready to start using the battery, we were told that our **GA rates were frozen for 2 years** in order to control rates. We, along with our partner, spent \$8M dollars to install this system that would relieve pressure on the grid during peak times and then we were told we couldn't use it for 2 years.
- This January we were advised by our local MPP to look for up to 15% savings on our Hydro bill to help cover the costs of hydro during COVID. **We did not see a reduction of any amount, and we actually saw an increase in our hydro costs despite reduced kwh consumption.** In fact, we saw additional charges to "pay back" the "savings" we were supposed to see during April, May and June of 2020.
- Our ability to compete in Canada and the rest of North America is made more difficult by having the majority of our manufacturing based in Ontario. **Our power rates in other provinces are much lower than what we pay in Ontario.** These numbers below are comparisons of costs by facility. We have presented them as a % of our Ontario rates.

Chilliwack BC	66.4% of Ontario costs
Calgary, AB	69.9% of Ontario costs
Lachute, QC	52.4% of Ontario costs

- Although we are focused on the business impact of these increases, we would also like to draw attention to the **increased cost of living for the residential individual**. We employ approximately 500 people in Ontario who are already seeing substantial increases in the cost of living. Reduction of these costs has become part of the platform for several of the political parties during the current election. Yet here we are, once again, discussing increasing hydro rates.

Our intended ongoing participation will include an ability to understand the proposed impact to our business and others like it, as well as being able to express our concerns of further increasing rates.

Note that we do not represent a group and we do not intend to seek an award of costs.

Ultimately, businesses in Ontario cannot continue to shoulder the costs of operating Hydro One. Like any other business right now, Hydro One needs to find ways to cut costs internally so they can operate efficiently and continue to provide services that we already pay too much for. Ontario businesses must be able to compete on a national and global scale. **These increases would be detrimental to manufacturing in Ontario.**

Sincerely,

Sandy Gott
Executive VP, Co-Owner



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