

From: [registrar](#)
To: [REDACTED]
Subject: FW: Letter of Comment - EB-2020-0246
Date: Tuesday, September 14, 2021 6:46:02 PM

From: webmaster@oeb.ca <webmaster@oeb.ca>
Sent: Monday, September 13, 2021 10:49 PM
To: registrar <registrar@oeb.ca>
Subject: Letter of Comment - [REDACTED]

The Ontario Energy Board

-- Comment date --
2021-09-13

-- Case Number --
EB-2020-0246

-- Name --
Nick Strube

-- Phone --
[REDACTED]

-- Company --

-- Address --
[REDACTED]

-- Comments --

I am writing regarding the transition from seasonal to low density residential. I am very concerned with the potential increase in rates for what is already a very expensive service.

For perspective, I am a seasonal customer that uses about 1,200 to 2,000 kwh per twelve months. However, with zero usage for two billing periods, my effective costs per kWh of usage are very high. Gross costs, prior to subsidies, have ranged from \$0.52 to \$0.78 per kWh (averaged over 12 months).

Higher relative costs occur with lower usage. This includes usage between Feb-2019 and Aug-2021, and most usage was during off-peak times. These costs are expected to rise further with the elimination of seasonal customer class.

These costs are already high by any standard. However, for comparison, I calculate that it would cost less than \$0.30 per kWh to generate electricity using gasoline or propane. Of concern with this approach would be the excessive noise from private generation, the effort to fuel the generator and the environmental impact of burning fossil fuels.

With the increase in HydroOne costs, the savings to switch to private generation increases. Solar panels and battery storage solutions are falling in price. Ironically, it is likely to be the seasonal customers most likely able to afford these systems, which means that the customers that you are about to charge more to are the customers that could move off-grid. This, in turn, puts greater cost pressures on other customers that do not switch to private generation.

It doesn't make intuitive sense that the public utility charges more than it would cost for private generation. The benefit of a public utility is to spread out costs and to benefit from economies of scale to generate at lower costs than that of private generation.

To conclude, HydroOne appears to already charge costs that are excessive.

Increasing these costs for seasonal customers will drive more customers away from HydroOne, thereby costing the system more in the long run. I urge the OEB and HydroOne to consider the long-term impacts of making this change to seasonal customers.

-- Attachment --