



PUBLIC INTEREST ADVOCACY CENTRE  
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December 7, 2021

VIA E-MAIL

Christine E. Long  
Board Secretary and Registrar (registrar@oeb.ca)  
Ontario Energy Board  
Toronto, ON

Dear Ms. Long:

**Re: EB-2020-0290 – Ontario Power Generation (OPG) 2022-2026 Payments  
Submissions on OPG Rate Smoothing Proposal**

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VECC's submissions on the draft Payments Order are only with respect to the smoothing alternatives as found in Appendix H of the November 29, 2021 DRO filing of OPG.

OPG proposes Alternative B which costs \$26 million in additional interest to be collected from ratepayers. We have reviewed the submissions of London Property Management Association (LPMA) with respect to this issue. LPMA recommends Alternative C as it minimizes the carrying costs (\$12 million) of the smoothing plan. We agree with LPMA that given the small differences in alternatives minimizing the cost to ratepayers should be a priority.

In fact, there is so little difference between the alternatives that the option of doing nothing should be given serious consideration. The average annual bill impact as between any of the alternatives is almost non-existent. We also observe that currently there are a number of assistance programs for customers who are impacted by the current pandemic or otherwise feeling the effects of fuel poverty. These include from some utilities expanded LEAP funding. These programs may not extend into the later years covered by the smoothing alternatives. Therefore, it is entirely possible, that the cost increases caused by financing smoothing alternatives will ultimately cause more, not less, harm to vulnerable customers over the entire term of the payment plan.

Yours truly,

Mark Garner  
Consultants for VECC/PIAC

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