

ChargePoint submission on EB-2002-0074 Design of an Optional Enhance TOU Rate

ChargePoint would like to thank the Ontario Energy Board (OEB) for the opportunity to participate in its consultation on the design of an optional enhance time-of-use (TOU) rate, and to provide comments through this submission.

Below we provide brief comments on the general design of an ultra-low overnight TOU optional residential rate:

- ChargePoint supports the OEB's exploration of a new alternative optional TOU rate with an ultra-low off-peak period. Optional rates support consumer choice and provide flexibility for customers to select a rate that best meets their needs. Further, shifting energy consumption to take place at times that are most beneficial to the grid, such as overnight periods when there is excess capacity, can provide great value to customers.
- For consumers with electric vehicles (EVs), shifting charging to the off-peak period described in the consultation (11pm-7am) will reduce the cost of fueling and the overall cost of owning an EV. Thus, making EVs more attractive to Ontario drivers.
- For customers with smart charging technologies, charging off-peak to take advantage of ultra-low rates will be seamless and easy as EV drivers can automatically program charging start times. Smart charging technologies can also be leveraged for seamless demand response in the future.
- Collectively, groups of customers charging off-peak could contribute to lower electricity system costs due to avoided capital upgrades, which could lower the overall cost of supporting EV loads. For example, a study analyzing the impacts of EV charging activity and time-of-use rates for the Salt River Project in Arizona found that time-of-use rates successfully shifted charging to off-peak hours, helping the utility defer future capital upgrade costs.¹
- Incorporating data from previous TOU pilots into the rate design process – as proposed in the consultation – will help improve the overall impact of the TOU rate as data suggests that larger price spreads between TOU periods can be more effective at encouraging changes in energy use patterns.

Thank you again for the opportunity to provide additional input into the engagement session. We look forward to further engagement. If there are any follow-up questions, please do not hesitate to contact us.

Suzanne Goldberg
Director, Public Policy – Canada
ChargePoint | chargepoint.com

¹ Utility Dive (2018), *Time of use rates can manage EV charging new report says*,
<https://www.utilitydive.com/news/time-of-use-rates-can-manage-ev-charging-new-report-says/515284/>