



Via OEB's online filing portal

March 3, 2022

Ontario Energy Board
2300 Yonge St, 27th Floor
Toronto, ON
M4P 1E4

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2022-0074 Stakeholder Meeting on Design of an “Optional Enhanced” Time of Use (TOU) Rate

Hydro Ottawa Limited (“Hydro Ottawa”) appreciates the opportunity to submit comments on the OEB staff’s proposed Alternative Time-of-Use (ATOUs) rate design as set out in the presentation materials on February 17th, 2022 and supports the comments of the Electricity Distributors Association (EDA) and the Ontario Energy Association (OEA) on this matter.

Hydro Ottawa is a licensed electricity distributor serving approximately 346,000 customers in the City of Ottawa and the Village of Casselman. Hydro Ottawa remains committed to delivering value across the customer experience by providing reliable, safe and responsive services to its customers.

Hydro Ottawa would like to highlight several of the OEB’s discussion points and their respective questions asked to their stakeholders:

Hydro Ottawa is supportive that the proposed ATOU price design has the potential to incentivize electricity usage behaviour which is beneficial to the electricity system. However, having two different peak periods for the TOU rate plans may appear to be counterintuitive to customers considering the aim is to reduce the provincial peak. As a result, effective customer education and support to enable them to understand and make an informed decision as to which rate plan is most suitable to them is required.

The proposed enhanced option appears to centre on an enhanced commodity price for residential customers with an incentive for existing EV owners to shift home charging to off-peak hours and if the incentive is high enough for EV charging to switch to the ATOU price plan. In addition, it is difficult to assess what effect the proposed rate will have on other RPP eligible-customers and what the implications of the impact will have on uptake, recovery customers, bill impacts, and risks.

The need for the proposed rate structures to be agile and responsive to future, and potentially-abrupt, changes in peak demand will be key success factors in effectively managing peak reduction, associated benefits and cost recovery.



Critical to the achievement of the RPP rate option goals is the establishment of timely and effective measures that assess the impact (e.g., customer response) of each rate option on the system peak. This will inform future rate design considerations and identify where existing pricing plans fall short of the intended goal(s), in order to adjust rates in an effective time frame. Given the scale and diversity of changes occurring within the energy market, ensuring that the TOU rates continue to drive the desired outcomes or do not give rise to some undesired outcomes, ongoing monitoring and analysis is recommended, including the potential TOU design changes, if needed.

Hydro Ottawa appreciates this opportunity to provide comments and looks forward to continued collaboration and partnership with the OEB on this initiative.

Sincerely,

DocuSigned by:

April Barrie

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April Barrie

Director, Regulatory Affairs

Directeur, Affaires réglementaires

AprilBarrie@hydroottawa.com

Tel./tél.: 613 738-5499 | ext./poste 2106

Cell.: 613 808-3261