

Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON
registrar@oeb.ca

March 3, 2022.

Re: Design of an Optional Enhanced Time of Use (TOU) Rate. EB-2022-0074

The Atmospheric Fund (TAF) appreciates the opportunity to comment on the OEB's proposed optional enhanced time-of-use rate structure. TAF is a regional climate agency supporting a net-zero future.

TAF supports the OEB's proposed structure involving low overnight rates and higher on-peak rates. The proposed rate changes will be effective in both lowering electricity costs for ratepayers and reducing greenhouse gas (GHG) emissions. The proposed rate changes will reduce peak demand by incentivizing customers to shift demand to off-peak hours, which will lower overall electricity costs by reducing system costs of generation, transmission, and distribution. Further, the proposed TOU rates will reduce GHG emissions in Ontario by encouraging distributed energy resources, which can replace gas generation.

TAF echoes the comments and recommendations submitted by Environmental Defence. In particular, we echo their **recommendation to ensure that customers with net meters are allowed to participate in the optional TOU rate structure**. Customers with net meters currently get switched by utilities from TOU rates to tiered rates, preventing these customers from benefitting from the new optional enhanced TOU rates. This could exclude many customers that might be interested in the optional rate. Additionally, net metering customers could provide additional power to the grid during peak demand times. **We recommend making this change simultaneously with the implementation of the optional enhanced TOU rates.**

Sincerely,



Bryan Purcell

VP of Policy & Programs
The Atmospheric Fund

About the Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.