

June 20, 2022

VIA: E-mail

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
P.O. Box 2319  
Toronto Ontario M4P 1E4

Dear Ms. Marconi:

RE: Interrogatories for Ontario Energy Board File # EB-2022-0145 re: Hydro One Networks Inc. Application for Exemptions from Certain Provisions in the Distribution System Code and for an Accounting Order.

Hydro One Networks Inc. has included a request in its Application dated April 11, 2022, for an exemption from the provisions of sections 7.11.1 and 7.11.7 of the Distribution System Code. Those provisions currently require a distributor to issue accurate bills to its customers 98% of the time on a yearly basis.

Hydro One also stated in paragraph 3 of its Application that:

The exemptions sought in this Application are for approximately 148,000 customers (the "Seasonal Customers") who will be transitioned from Hydro One's current seasonal rate class to one of three Hydro One residential rate classes according to their respective density.

Interrogatories:

Additional background information including a clear and detailed statement of Hydro One's rationale for the request for exemption from sections 7.11.1 and 7.11.7 of the Distribution System Code would assist in understanding, and thereby better appreciating, the request.

The following questions are very much of a general nature and are intended to provide an enhanced understanding of the Hydro One request. Given the limited background information provided in its Application, some of the questions that follow may well be more relevant than others.

1. Might the decline in the accuracy of seasonal customers' bills be due to under billing, over billing, a combination of both, or be attributable to other factors? If the former, would Hydro One expect there to be more under billings than over billings overall, or vice versa? If the inaccuracies are in fact expected to be due to other factors, please provide additional background details regarding the impacts on seasonal customers.
2. Will those impacted by this request broadly include the whole of the 148,000 seasonal customer base, or will those impacted be limited to more specific sets or subsets of the seasonal customers being transitioned? If the latter, could Hydro One provide the specifics? For example, will certain of the seasonal customer classes being transitioned to one of the three residential classes be impacted by Hydro One's request? Or will certain sets, or subsets, of seasonal customers be impacted more significantly or exclusively? For example, would higher versus lower consumption seasonal customers in certain classes be more likely to be impacted by Hydro One's request?
3. Does Hydro One have a plan in mind to make the correction(s) necessary in future to produce an accurate bill where an inaccurate bill has been produced for a seasonal customer? If so, how would the process work? For example, will Hydro One pursue a "behind the scenes" process to make a subsequent bill correction, or will Hydro One rely on a seasonal customer being transitioned to bring the matter to their attention?
4. Does Hydro One plan any additional communications to seasonal customers in this matter?
5. Hydro One's request would essentially span a five-year period from 2023 through to 2027. Could Hydro One provide its rationale for the length of time it is requesting for this particular exemption?
6. Has Hydro One previously requested any kind of a similar exemption from the 98 per cent standard cited in sections 7.11.1 and 7.11.7 of the Distribution System Code for a wide scale implementation? If so, please provide details.

All of these interrogatories are respectfully submitted. I also wish to extend my thanks to Hydro One staff in advance for their consideration of this request for additional information to better understand Hydro One's request for an exemption from the provisions of sections 7.11.1 and 7.11.7 of the Distribution System Code.

*Original signed by:*

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