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Sent by Email

August 23, 2022

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Marconi:

Re: EB-2022-0013 – Alectra Utilities Corporation. Final Submission

In accordance with procedural order No. 1 for the above-noted proceeding, please find enclosed SBUA's written submission.

Yours truly,

Myriam Seers

cc. All parties in EB-2022-0013

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B, as amended;

AND IN THE MATTER OF an application by Alectra Utilities Corporation for an Order or Orders approving Incremental Capital Module funding to undertake urgent underground cable renewal projects in the PowerStream Rate Zone and the Enersource Rate Zone for 2023 and 2024.

EB-2022-0013

SMALL BUSINESS UTILITY ALLIANCE WRITTEN SUBMISSION

Overview

1. The Small Business Utility Alliance (SBUA) supports approval of the Incremental Capital Module funding to undertake urgent underground cable renewal projects in the PowerStream Rate Zone and the Enersource Rate Zone for 2023 and 2024 proposed by Alectra Utilities Corporation.
2. However, SBUA is concerned about disruptive impacts on small businesses during the projects. To mitigate such impacts, SBUA submits that approval should be contingent on Alectra implementing clear and concrete measures to mitigate and/or address the consequences arising from the interruptions or impacts of the projects on small business customers, as follows:
 - implementing a system of email and mobile alerts through which consumers can receive real-time information about the power outages;
 - providing a generator for those businesses that do not have any kind of outage backup and whose products may be endangered by power outages;

- establishing a strategy to educate customers on measures to be taken before and after a power outage in order to avoid damage to their equipment; and
- putting in place a compensation program to compensate small businesses for losses arising from the interruption.

Negative consequences of the projects to be carried out for lower-volume business customers

3. Based on Alectra's answers to SBUA's interrogatories, it is clear that the proposed work, although necessary, has a significant impact on the energy supply of lower-volume business customers.
4. Indeed, in relation to the cable replacement, Alectra was clear in pointing out that the project could take between three and five months to install, a period of time in which users could experience electricity outages, increased traffic, reduction in on-street parking, and problems in accessing a parking lot:

Depending on the scope of the project, the duration of construction can last between three to five months. (...)

Alectra Utilities works in partnership with all its customers to ensure that during the execution of projects, minimal to no interruptions are experienced by customers. This includes providing notice to customers in advance and discussions with staff onsite during work, if required. This may also include assisting with some traffic control or relocation of equipment for deliveries or site access.¹

5. In relation to the cable injection, Alectra stated that the installation would also take between three and five months, during which time customers would experience interruption in the energy supply of up to six hours and

¹ Responses to Small Business Utility Alliance Interrogatories, [Alectra IRR SBUA 20220802](#), pag. 1.

some of them would even have a second interruption of fewer than two hours.²

6. In response to SBUA's request to explain the measures it planned to take to mitigate disruptions in connection with the cable replacement, Alectra only stated that it was working with customers to ensure that there would be little or no disruption, without describing specific measures other than providing advance notice to customers, as well as assisting with some traffic control or relocation of equipment for deliveries or site access.³
7. This is also the case for the cable injection, in respect of which Alectra stated that customers would receive a notice at least one week in advance informing them about the outage.⁴
8. Alectra's responses suggest that its application for an Order approving Incremental Capital Module funding to undertake urgent underground cable renewal projects in the PowerStream Rate Zone and the Enersource Rate Zone for 2023 and 2024 does not have an adequate, clear, and concrete plan that contemplates mitigation and/or remediation measures for the negative effects of its projects.
9. Lower volume business customers can be affected by an outage in different ways, depending on their business. In general, an interruption in the energy supply can generate downtime and loss of productivity, increased costs, and even inventory losses.
10. Mitigation and compensation strategies are critical in ensuring that such customers are not unduly impacted by such outages.

Requested condition to approval

11. Because of this, SBUA respectfully requests that the Ontario Energy Board make its approval of the requested Incremental Capital Module funding contingent on appropriate measures being put in place to mitigate

² Responses to Small Business Utility Alliance Interrogatories, [Alectra IRR SBUA 20220802](#), pag. 2.

³ Responses to Small Business Utility Alliance Interrogatories, [Alectra IRR SBUA 20220802](#), pag. 1.

⁴ Responses to Small Business Utility Alliance Interrogatories, [Alectra IRR SBUA 20220802](#), pag. 2.

impacts on small businesses and compensate them for losses they may incur as a result of the works being proposed, as set out in paragraph 2 above.

Respectfully submitted on behalf of the Small Business Utility Alliance on August 23, 2022