



August 25, 2022

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

Dear Ms. Marconi,

RE: EB-2022-0079 - Non-RPP Class B Pricing Pilot Program

In response to the stakeholder's consultation held on July 28, 2022, Direct Energy acknowledges the importance of developing a pricing pilot and would like to submit the following questions for OEB staff to consider as it designs the pilot program:

1. How will the benefits and negative outcomes of each pilot be determined with multiple pilots running simultaneously?
2. With each of the pilots likely attracting different proponents/sectors, and assuming each alters their behaviour accordingly, how will this affect other rate classes during the pilot period and after?
3. How can the OEB ensure that the end users' outcomes are in line with overall system benefits based on small data samples?
4. Has the OEB found or does the OEB intend on finding at least one LDC that is willing to participate in this pilot? If this has already been done, can the OEB release this information so proponents can better focus on specific geographic areas or sectors?
5. If there are no willing utilities, what would the next steps be for the OEB in relation to the pilot?
6. Given the nature of shifting system costs to other rate classes, how will the OEB ensure that litigious actions are not brought forth by affected sectors, proponents, etc, that did not participate in the pilot?

Direct Energy appreciates the opportunity to be part of this initiative. Should further information or clarification be required, please do not hesitate to contact me.

Sincerely,

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