

August 6, 2022

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

Dear Ms Marconi:

**EB-2021-0243 – Generic UTR Issues Proceeding – Export Transmission Service Rate**

We are representing the Consumers Council of Canada in the above-referenced proceeding. We have reviewed the detailed submissions filed on behalf of the Vulnerable Energy Consumers Coalition in the above-referenced proceeding. VECC's recommendations are as follows:

- Increase the ETS rate to \$3.00/MWh somewhere between 6-12 months after the Board issues its Decision (resulting in an ETS rate adjustment sometime mid to late 2023);
- Increase the ETS rate on January 1 of each year during Hydro One Network's CIR period (2024 to 2027) by the same RCI percentage that is used to adjust Hydro One's transmission revenue requirement; and
- Undertake a review of the ETS rate at the time of Hydro One Networks' transmission revenue requirement (currently 2028 based on Hydro One Networks' proposed five year term in its current CIR Plan application)

The Council supports these recommendations as they represent an appropriate balance among the principles of fairness, efficiency and practicality.

Yours truly,

**Julie E. Girvan**

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CC: All parties