

NOTICE OF PROPOSAL TO AMEND THE STANDARD SUPPLY SERVICE CODE AND THE REGULATED PRICE PLAN MANUAL

Consultation Process EB-2022-0160

Written Comments of the Building Owners and Managers Association (BOMA)

November 4, 2022

Background

The Ontario Energy Board (OEB) gave notice under section 70.2 of the Ontario Energy Board Act, 1998 (OEB Act) of proposed amendments to the Standard Supply Service Code (SSSC) to implement a new optional ultra-low overnight (ULO) price plan for electricity consumers on the Regulated Price Plan (RPP). The OEB is also giving notice of related proposed amendments to the Regulated Price Plan Manual (Manual).

Comments

BOMA has reviewed the complete text of the proposed amendments to the SSSC and the Regulated Price Plan Manual and is supportive both of the flexibility and low impact of the approach. BOMA's interests are in providing opportunities and incentives for commercial customers to reduce utility bill costs, reduce peak demand in the system and support the transition to a low carbon future. BOMA welcomes the OEB's flexible approach that fully supports customer choice on a large scale while minimizing implementation costs and barriers. We agree that any RPP consumer with a smart meter should be eligible to select the new ULO price plan and that there be no limits on the frequency of switching between price plans. Continuing the existing customer choice rules will also reduce confusion and clarify communication to customers, so BOMA also agrees with this approach.

We support the proposed amendments to both the SSSC and the Regulated Price Plan Manual and have nothing further to add.

Success of this new ULO price plan will depend on communication to customers and further penetration of smart meters. BOMA would be interested in reviewing the changes made to the OEB-approved price comparison templates that retailers are required to provide to low-volume consumers and other consumer-facing materials currently required to be used by electricity retailers if feedback is being solicited.

BOMA is willing to support the communication of the ULO price plan to its members when retailers have fully implemented the ULO price plan and communications.