

**Kaleb Ruch**  
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November 7, 2022

Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th floor  
Toronto, ON M4P 1E4

**RE: Enabling the Implementation of an Ultra-Low Overnight Price Plan - Notice of Proposal to Amend the Standard Supply Service Code (SSSC) and Regulated Price Plan (RPP) Manual  
Ontario Energy Board File Number: EB-2022-0160**

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Toronto Hydro-Electric System Ltd ("Toronto Hydro") is the local electricity distribution company for the City of Toronto. It has over 780,000 customers and delivers about 18% of the electricity consumed in Ontario.

On October 17, 2022, the OEB proposed amendments to the Standard Supply Service Code ("SSSC") and the Regulated Price Plan Manual ("RPP Manual") to implement a new optional ultra-low overnight ("ULO") price plan for electricity consumers on the Regulated Price Plan. The amendments reflect and align with the Ministry of Energy's ("MOE") recently proposed changes to O.Reg 95/05, and build upon existing industry rate design structures intended to enable the introduction of the ULO price plan as early as May 1, 2023. The ULO price plan itself is the culmination of extensive work by the MOE and the OEB, with input from industry stakeholders, to offer additional customer choice to Ontario's electricity ratepayers.

As noted in its prior submissions on this initiative, Toronto Hydro continues to strongly support the OEB's and Government's efforts to bring additional choice to Ontario's low volume electricity consumers, as well as the steps being taken to prepare the province for a modernized energy sector on the path to electrification. Toronto Hydro has reviewed the proposed SSSC and RPP Manual amendments and believes they all reflect and build upon previously communicated design elements of the ULO Rate Plan. Toronto Hydro does not have any additional specific comments or concerns to note for the OEB's consideration.

Toronto Hydro reaffirms that it continues to target the May 1, 2023 implementation date for its customers, subject in part to the continued attainment of path-critical milestones, including these timely amendments. Toronto Hydro will continue to work collaboratively with stakeholders on this effort in support of those ends.

Sincerely,

A handwritten signature in black ink, appearing to read "Kaleb Ruch", written over a horizontal line.

**Kaleb Ruch**  
Director, Energy Policy and Government Relations (Secondment)  
Toronto Hydro-Electric System Limited

KR/jl