

Ms. Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

November 8, 2022

EB-2022-0160 Proposal to amend SSSC and RPPM - Pollution Probe Comments

Dear Ms. Marconi:

The OEB letter dated October 18, 2022 for the above-noted consultation requested comments from stakeholders. Pollution Probe supports the Minister of Energy and Ontario Energy Board (OEB) efforts in support of an optional enhanced time of use (TOU) rate to further incent demand-shifting away from peak periods to lower demand periods. Pollution Probe also thanks the OEB for the Stakeholder session September 13, 2022 to review the proposed amendments and to provide feedback.

The proposed amendments to the Standard Supply Service Code (SSSC) require distributors to allow Regulated Price Plan (RPP) consumers with smart meters to opt in to the new ultra-low overnight (ULO) price plan and establishes rules for how consumers can do so. Pollution Probe has reviewed the proposed amendments and supports the proposed amendments. This includes support that the proposed SSSC amendments do not include a limit for customers switching. The OEB can review whether switching occurs and if required understand the consumer basis for switching. Switching is not expected to be a significant issue and placing restrictions on consumers for innovative rate plans can add unnecessary restrictions and be perceived as a barrier reducing the number of consumers leveraging this option.

Energy rates and options can be confusing to consumers and they can also have trouble following the regulatory amendment process. Providing simple and clear information to consumers and providing the maximum flexibility to consumers will help ensure that this initiative achieves the outcomes intended by the Ministry of Energy and the OEB. Simplicity and effective communication are essential to success as the Ministry and OEB implement and communicate this option to Ontario consumers.

Respectfully submitted on behalf of Pollution Probe.



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