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Nov. 8, 2022

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Marconi:

Re: EB-2022-0160 – Notice of Proposal to Amend the Standard Supply Service Code and the Regulated Price Plan Manual – Written Comments of LPMA

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 also gave notice of related proposed amendments to the Regulated Price Plan Manual (“Manual”).

These are the comments of the London Property Management Association (“LPMA”) related to the proposed amendments to the SSSC and the Manual.

LPMA supports the proposed amendments to both the Standard Supply Service Code and the Regulated Price Plan Manual. In particular, LPMA supports the transition period that would run from as early as May 1, 2023 to as late as November 1, 2023 as well as the continuation of the customer choice rules that are already in place, and which would be expanded to include the ULO pricing option.

LPMA also supports the “no limits” on the frequency of switching between price plans, as well as the bill display associated with the ULO price plan, as proposed in the amendments.

LPMA’s remaining comments are focused on consumer information and the ability of consumers to access information required to make informed decisions around which pricing plan is most cost effective for them.

Many current online bill calculators, such as that available on the OEB website require customers to input their monthly consumption broken down into the current TOU buckets of off-peak, mid-peak and on-peak hours. If a customer wants to know if Tiered pricing is more cost effective for them on an annual basis, they must do this for 12 months. This requires them gathering the data from their bills or going online with their local utility to obtain the information.

This may have been appropriate since most customers were on TOU rates and the move to Tiered pricing was a simple calculation. However, the bill calculator does not work well if the customer is considering moving from Tiered pricing back to TOU pricing, as the customer does not have its monthly consumption broken down by off-peak, mid-peak or on-peak period shown on their bills when they are billed on the two tiers. Customers have to log onto their account with their local utility and find their hourly consumption for each day of the month and then aggregate it into the three existing TOU buckets. For a full 12-month comparison of costs, this becomes a tedious exercise that most customers would not do.

With the addition of the ULO pricing plan, the data needed for the billing calculator increases significantly and becomes much more complicated, as the 3 TOU buckets do not align with the 4 ULO buckets in terms of the hours, which is in turn complicated by the difference in TOU hours in the winter versus the summer, while the ULO hours do not change by season.

It is important for customers to have a full year view of the costs of the Tiered, TOU and ULO pricing plans based on current rates so that they can make an informed decision on which price plan is best for them. In many cases, one plan might cost less in one or two months, while another plan may be less costly in the other months. With three price plans available, the annual costs are important for customers to know and understand. Basing a decision on only 1 or 2 months of actual consumption could be misleading, resulting in customers being misled as to which pricing option is best for them.

In this digital age, LPMA believes that the bill calculator should be easy to use and not require customers to input their actual consumption data in the seven time-based buckets that will be associated with the TOU and ULO pricing plans. Customers should not even be required to input their total monthly consumption. All of this information should be available and uploaded into the bill calculator model at the touch of a button.

Specifically, a customer should be able to log in to their local utility, access their account information and click on a button to do a price comparison between the Tiered, TOU and ULO pricing plans based on current rates that produces a table that shows the kWh consumption by Tier/TOU bucket/ULO bucket and the associated costs, along with the totals by month and the annual figures for the last 12 months of actual consumption (or the number of months available if 12 months of actual consumption is not available). All of the historical data needed is readily available electronically and should be automatically aggregated and inserted into the bill calculator model. This would eliminate customer frustration and errors in aggregating their own data.

LPMA has attached an illustrative example of the output that should be made available to customers based on their historical consumption. For simplicity, the illustration shows only one month of actual consumption based on a hypothetical level of consumption of 1,000 kWh.

LPMA submits that it is critical for consumers to have readily available accurate information for them to make informed decisions on which pricing plan they want to participate in and to have this information provided to them at the touch of a button.

Sincerely,

Randy Aiken
Aiken & Associates

