

AGORA

Agora International Law PC
Bay Adelaide Centre West
333 Bay Street, suite 900
Toronto, ON M5H 2R2
Canada

Myriam Seers
mseers@agora.law
+1 416 886 7154

Sent by Email

March 16, 2023

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Marconi:

Re: EB-2022-0028 – Application for approving rates and other charges for electricity distribution by EPCOR Electricity Distribution Ontario Inc. – SBUA Final Argument

We are counsel to the Small Business Utility Alliance (SBUA). Please find enclosed SBUA's final argument in the above-noted proceeding.

Yours truly,



Myriam Seers

cc. All parties in EB-2022-0028

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B, as amended;

AND IN THE MATTER OF an application by EPCOR Electricity Distribution Ontario Inc. (EEDO) for approval of rates and other charges for electricity distribution to be effective October 1, 2023.

EB-2022-0028

SMALL BUSINESS UTILITY ALLIANCE ARGUMENT SUBMISSION

A. THE APPLICATION

1. Enbridge has applied to the Ontario Energy Board for approval of rates and other charges for electricity distribution to be effective October 1, 2023.

B. SMALL BUSINESS UTILITY ALLIANCE ARGUMENT SUBMISSION

2. SBUA submits that EDDO ought to implement changes to their capital and OM&A structures to create programs specifically focused on small business customers. In case the Ontario Energy Board does not consider it feasible for this application, SBUA submits that EDDO implement those strategies or program for future applications.
3. Notwithstanding the fact that customers on GS<50 comprise a major percentage of overall consumers, EDDO has not considered any program or strategy focused on GS<50 customers. There is nothing in the budget regarding GS<50 specifically, as recognized by Mr. Hesselink in the interrogatories:¹

“MS. SEERS: I just have a few questions focused primarily on community relations

¹ Oral hearing held by videoconference transcript. February 14, 2023. Pp. 122-123.

as they relate to small businesses. So firstly, EEDO is proposing as part of its OM&A an annualized 3.2 percent increase in community relations to 188,553 by 2023. So the question is: Considering that the customer satisfaction survey conducted by RedHead in 2021 indicates that only 75 percent of customers in the under the 50-kilowatt category are satisfied with the services provided, versus 85 percent in the residential class. Are there any strategies or programs that are specifically focused on customers in the under 50-kilowatt group that are derived from this proposed increase in OM&A?

MR. HESSELINK: I don't know if there is anything explicit in it. We do have a lot of interactions with our small business or small commercial customer representatives, with our CSRs, customer service representatives, where we are providing, you know, access to programs. The Conservation First framework in the CDM programs were a good example of that historically, and with some of the changes happening in the industry, that was always a good conversation piece, but I don't have anything specific there other than, whenever we're speaking with customers we are trying to provide options and programs that are available to them, whether it's, you know, through EPCOR itself or through something, you know, as a utility basis as a whole”.

4. As stated above, EDDO recognizes that small business customers and residential customers are different, and it is thereby necessary to include specific programs for this target group:²

“MS. SEERS: Would you consider going forward including any specific programming that is directly targeted to that class, which is small business class, as opposed to residential, because they have different needs?

MR. HESSELINK: They do have different needs and, yeah, I think we would consider that, and it is an interesting market because a lot of it is, you know, self-employed people, smaller business, that might not have the same resources that maybe some of the larger commercial customers would have, so we would always be looking for ways to reach out to those customers and to be able to connect to them”.

² Oral hearing held by videoconference transcript. February 14, 2023. Pp. 123-124.

5. In that sense, a gap clearly exists between what is acknowledged, and what has been implemented. There is a lack of any specific programming aimed at small businesses. This ought to be changed by, for example, hiring specific consultants to identify how to specifically target the unique needs of this group of customers.

Submitted on behalf of the Small Business Utility Alliance this March 16, 2023.