

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF a generic hearing to consider
various issues related to Uniform Transmission Rates.

EB-2022-0325

**SUBMISSIONS ON ISSUE #3
OF
DISTRIBUTED RESOURCE COALITION
(DRC)**

February 1, 2024

A. Introduction

1. We are counsel to the Distributed Resource Coalition (“**DRC**”) in the Ontario Energy Board’s (the “**OEB**” or the “**Board**”) generic hearing to consider various issues related to Ontario’s Uniform Transmission Rates (“**UTRs**”) (EB-2023-0325).
2. DRC has full intervenor status in this proceeding. DRC is a group of electricity customers and consumers, consisting of end-use residential customers, non-profit organizations, and owners’ associations. Its members are directly affected by and interested in: (i) optimizing existing energy assets; (ii) efficiently facilitating the integration of existing and innovative distributed energy resources (“**DERs**”), including electric vehicles (“**EVs**”), to achieve customer and grid solutions; and (iii) providing input on direct customer needs and local distribution company opportunities relating to EVs. DRC’s members for this proceeding include, subject to further update, the Electric Vehicle Society (“**EVS**”) and Plug’n Drive (“**PnD**”).

B. Overview

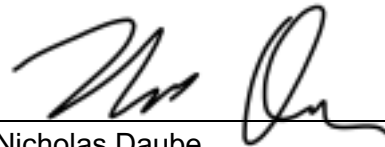
3. DRC’s submissions for the purposes of this stage of the proceedings are limited to Issue #3 and the question of whether transmission charges for new connections should be prorated to account for when the connection took place in the month.
4. DRC takes no position on Issues #1 or #2.

C. DRC Supports the Recommendations of OEB Staff on Issue #3

5. DRC supports the recommendation of OEB Staff to pro-rate the monthly charge that a newly connected transmission customer pays to account for when in the month the new connections were made.
6. DRC similarly agrees with the specifics of OEB Staff’s recommendation, including:
 - (a) the proration should be a simple calendar days-based proration; and
 - (b) the proration can be calculated on the basis of the total charge (e.g., \$/month), the connection rate (e.g., \$/kW/month), or on the billing demand (e.g., kW).

7. DRC supports OEB Staff's recommendations for the following reasons:
- (a) The recommendations represent a fair approach that ensures costs for individual customers will be directly related to the services they receive;
 - (b) Similarly, the recommendations ensure that transmitters will be required to keep accurate accounts of services rendered, which will assist in the design and implementation of demand side management programs and smart grid technologies, as well as the future integration of DERs;
 - (c) The recommendations will also ensure that new customers are not effectively providing a subsidy to existing customers or to transmitters;
 - (d) Similarly, the recommendations reduce the likelihood of windfall profits resulting from the timing of any given connection.

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
1st day of February, 2024



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