



BY EMAIL and RESS

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February 1, 2024
Our File: EB20220325

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2023-0325 – General Hearing on UTRs Phase 2 – Issues 1, 2 and 3

We are counsel to the School Energy Coalition ("SEC"). Pursuant to Procedural Order No. 1, these are SEC comments on the OEB Staff's recommendations on how to address Issues 1, 2, and 3. SEC is generally in agreement with the proposed recommendations of the OEB Staff.

With respect to Issue 3, while SEC agrees with the recommendation to pro-rate charges for line and transmission connection charges for new connections in their first month, there are three additional considerations that should be addressed.

First, it is not clear to us, and it is not discussed by OEB staff, why the same principle would not apply to the network charge. SEC recognizes there are some differences in how the amounts are calculated, and so that may be the appropriate rationale, but the matter should be addressed. Second, the same proposed approach should apply to customers who end service at a connection point. They should similarly have their charges pro-rated in their last month of service.

Third, we are aware that other intervenors have raised the issue that the same principle should also apply to distribution connection customers' payment of RTSRs (which are simply a way for distributors to collect UTR costs they pay). SEC agrees. For customer classes who pay RTSRs on a demand basis (e.g., GS>50)¹, there is no reason that the same proposed treatment should not apply for a customer's first (and last) month.

¹ For customers who pay RTSR charges on a kWh basis (e.g. residential, GS< 50) the issue does not arise since they pay based on their actual consumption during the month. The farther in the month they connect, all else being equal, the less they pay in RTSRs.



Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

cc: Brian McKay, SEC (by email)
Intervenors (by email)