



BY EMAIL and RESS

Mark Rubenstein
mark@shepherdrubenstein.com
Dir. 647-483-0113

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

April 15, 2024
Our File: EB20220325

Attn: Nancy Marconi, Registrar

Dear Ms. Marconi:

Re: EB-2022-0325 – UTRs Phase 2 – Technical Conference Clarification Questions

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order No.1, attached please find a copy of SEC’s Technical Conference Clarification Questions.

Yours very truly,
Shepherd Rubenstein P.C.

Mark Rubenstein

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

SEC Technical Conference Clarification Questions**SEC-1**

[Background Report, p.4] SEC seeks to understand the magnitude of the double peak billing issue:

- a. For each year between 2021 and 2023, and by customer type (LDC and non-LDC customers), please provide the number of customers impacted by double peak billing as a result of scheduled outages, and the frequency in that year (e.g. in 2021 3 LDC customers had 1 double billing month, 1 LDC customers had two double billing months etc). If an exact numbers cannot be determined, please provide an estimate, and specify all the assumptions made.
- b. Please provide a revised version of part (a), for double billing events caused by non-schedule outages.
- c. If Option 4 had been implemented beginning in 2021 for schedule outages, what would the balance be in the DVA for each year between 2021 and 2023. Please also provide a breakdown between amounts related to double peak billing by LDC and all other load customers. If an exact amount cannot be determined, please provide an estimate, and specify all the assumptions made.
- d. Please provide a revised version of part (d), assuming the DVA also captured non-schedule outages.

SEC-2

[Background Report, p.4] Hydro One raises the issue that there are similar double peak billing events for certain distribution customers. SEC seeks to understand the magnitude of double peaking billing on the distribution system:

- a. How many Hydro One Distribution, by rate class, are served by more than 1 connection that would allow load to be shifted between connections.
- b. Please provide an estimate of the annual total number of customers, by rate class, who are impacted by double peak billing, caused by each of scheduled and non-scheduled outages.

SEC-3

[Background Report, p.3, ft 3] Hydro One raises the issue of customers who are connected to both the transmission and distribution system.

- a. For all non-LDC Hydro One Transmission load customers located in Hydro One Distribution's service territory, how many have a connection to both the transmission and distribution system that would allow load to be shifted between the two connections?
- b. What are the potential options in dealing with this issue?

SEC-4

[Background Report, p.7] Please provide Hydro One's preferred option to address the double peak billing issue and the reasoning.

SEC-5

[Background Report, p. 18] As part of its options analysis, Hydro One references increased customer metering costs that would need to be incurred to implement gross-load billing. Please provide details

regarding an estimate range of costs a customer would incur for the required metering infrastructure. Please confirm that those costs would be paid for by the specific customer.

SEC-6

[Background Report, p.19] Please explain Hydro One's view on the appropriateness of gross-load billing in general.

SEC-7

[Background Report, p. 15] Please explain Hydro One's preferred option for addressing each of its 4 identified sub-issues.