

# Elson Advocacy

May 21, 2024

**BY RESS**

**Nancy Marconi**

Registrar

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Marconi:

**Re: EB-2022-0325 – UTR Generic Hearing**

I am writing on behalf of Environmental Defence to provide submissions on the draft detailed issues list prepared by OEB Staff.

The draft detailed issues list appropriately captures the issues that have been raised by Hydro One. The OEB Staff draft also maintains the broader issue descriptions listed in *Procedural Order #1*, such as issue #5 – “basis for billing renewable, non-renewable and energy storage.” In addition, Environmental Defence also requests that a sub-issue be added to ask whether gross load billing and its current implementation continues to be appropriate in light of the current context of demand growth, transmission constraints, and the energy transition. This sub-issue is certainly worth exploring as much has changed since gross load billing was first put in place.

This proposed sub-issue would allow the parties to consider the merits of gross load billing more broadly, including alternative approaches or exemptions to the existing approach. For instance, Hydro One noted in response to one of Environmental Defence’s clarifying questions that there is merit in considering exemptions to gross load billing in areas that are transmission constrained.<sup>1</sup> The sunk costs that gross load billing are meant to avoid are less likely in these areas. This idea would not be captured by the proposed sub-issues, but is worth exploring. An additional sub-issue may not be strictly necessary because of the broad wording of issue 5, but would nevertheless help to encourage examination of important factors and proposals.

Yours truly,



Kent Elson

cc: Parties in the above application

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<sup>1</sup> Clarifying Question ED-1.