

July 10, 2024

Ms. Nancy Marconi  
Ontario Energy Board  
PO Box 2319  
27th Floor, 2300 Yonge Street  
Toronto, Ontario M4P 1E4

**Re: EB-2022-0325 – Phase 2 of the Generic Hearing on Uniform Transmission Rates  
Letter of Comment**

Entegrus Powerlines Inc. (“EPI”) is an intervenor of record in the Generic Hearing on Uniform Transmission Rates – Phase 2. EPI has focused its participation in the proceeding through its membership in the LDC Transmission Group.

The LDC Transmission Group proposed additional sub-issues under Issue 4 for the Issues List, including the impacts of double-peak billing to distribution-connected customers.

On July 5, the OEB issued Procedural Order No. 3 (“PO #3”) in the above-noted proceeding, which included the Approved Issues List. PO #3 stated:

*“This phase of the OEB’s generic proceeding deals only with UTRs, so the impacts of double-peak billing on distribution-connected customers will not be examined.”*

EPI understands that the matter of distribution-connected double-peak billing is not being pursued at this time. While EPI will continue to support the LDC Transmission Group in this proceeding, EPI is hopeful that there will be an opportunity to address this matter in a future OEB proceeding, as distribution-connected double-peak billing can have a significant customer impact. Due to the balancing process involved in load transfers, distribution-connection double-peak billing is often fundamentally intertwined with transmission-connected double-peak billing. One example, noted below, has been estimated to result in incremental costs to customers of approximately \$1 million, or \$23 per customer.

In the EB-2022-0325 April 2, 2024, Hydro One Networks Inc. (“HONI”) Background Report, at Issue 4 (page 19 of 20), HONI cites the following example of double-peak billing at the distribution level:

*“Example 6*

*Hydro One Distribution (“Customer A”) is a transmission-connected LDC at the two transmission stations TS-A and TS-B. An LDC (“Customer B”) is a distribution-connected LDC served by Hydro One Distribution (“Customer A”) at TS-A and TS-B. In December 2017, in order to perform maintenance activities at TS-A, Hydro One Transmission initiated a load transfer from TS-A to TS-B. As a result of this load transfer, Customer B incurred distribution delivery charges related to double peak billing*

*charged by Customer A and Customer A incurred additional transmission charges related to double peak billing charged by the IESO.”*

Based on the above description, EPI believes it is Customer B in the example cited by HONI. In addition to the EPI distribution-connection cited in the example above, EPI is also transmission-connected at this TS. Ultimately, EPI was involved in many additional switching configurations for this example, including both transmission-connected double-peak billing and distribution-connected double-peak billing, extending into mid-2018. For EPI customers, a small portion of the incremental costs were transmission-connected, while the majority of the approximately \$1 million in total incremental costs were distribution-connected. While the impact to Customer A would be addressed, and hopefully remedied, in this proceeding, the impact to Customer B (EPI) would not.

Transmission-connected double-peak billing and distribution-connected double-peak billing are often fundamentally intertwined. This issue can have a considerable financial impact on customers that should not be lost. EPI appreciates your consideration of this matter.

All of which is respectfully submitted,

David Ferguson  
Chief Regulatory Officer & Vice President of Human Resources  
Entegrus Powerlines Inc.  
Phone: 519-352-6300 Ext 4558  
Email: david.ferguson@entegrus.com