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To: Ontario Energy Board

Subject: Feedback on Non-RPP Class B Dynamic Pricing Options

Thank you for the opportunity to provide feedback on the OEB's efforts to introduce new dynamic pricing options for non-RPP Class B customers. As a leading provider of electric vehicle (EV) charging and energy management solutions for multi-unit residential and commercial properties, SWTCH Energy Inc. appreciates the chance to contribute to this important discussion.

While we understand that the impetus of this initiative extends beyond EV charging, we believe there is a significant connection between dynamic pricing and the growing need for efficient, cost-effective EV charging solutions in multi-unit residential buildings (MURBs) and small-scale commercial and industrial (C&I) properties.

After careful consideration of the proposed options, SWTCH strongly recommends the implementation of Option 1 – Non-RPP Time-of-Use pricing. We believe this option presents a compelling opportunity to incentivize efficient EV charging practices for Class B customers, particularly in MURBs and small-scale C&I settings.

The Non-RPP TOU option offers several key advantages that align well with the needs of property managers, condo corporations, and EV owners:

1. Predictable Pricing Periods: The fixed pricing periods, set annually and consistent across seasons, provide much-needed predictability. This feature is particularly beneficial for property managers and residents with EVs, as it allows for easy scheduling of charging during off-peak hours. Our experience shows that these off-peak periods align well with typical EV charging patterns, making it convenient for users to adopt cost-saving behaviors.

2. Simplicity and Transparency: The straightforward structure of the TOU pricing makes it easy for property managers to implement "zero-based" billing. This approach ensures that EV charging services can be provided at a consistent fee without risking profit loss or unexpected costs due to global adjustment variability.

3. Optimization of Shared Infrastructure: For properties with shared EVSE infrastructure, the TOU pricing model enables site hosts and station owners to optimize their pricing strategies. This optimization can more accurately reflect real-time costs and create strong incentives for off-peak charging, leading to more efficient use of resources and potentially reducing the need for costly electrical system upgrades.

4. Smart Charging Integration: The predictable nature of TOU pricing facilitates the integration of smart charging systems and load management solutions. These technologies can be programmed to automatically schedule charging during off-peak hours, maximizing savings for residents and optimizing energy use at both the EVSE and building levels.

The implementation of Non-RPP TOU pricing has the potential to significantly accelerate the adoption of EVs in multi-unit residential and small commercial settings by making the operational cost of charging more affordable and manageable. It aligns well with the broader goal of energy efficiency while providing tangible benefits to property managers and EV owners alike.

In conclusion, SWTCH unreservedly supports Option 1 – Non-RPP TOU pricing. We believe this option offers the best balance of simplicity, predictability, and incentive structure to drive positive change in EV charging behaviors and energy management in MURBs and small-scale C&I properties.

We strongly encourage the OEB to work towards an implementation date of May 1st, 2025, for this pricing option. This timeline would allow for adequate preparation and education of stakeholders, ensuring a smooth transition to the new pricing structure.

Thank you for your consideration of our feedback. We look forward to the positive impact this initiative will have on Ontario's energy landscape and EV adoption rates.

Best,

Mike Frisina
Director, Policy – Canada
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