



October 10, 2024

Nancy Marconi  
Registrar  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street  
Toronto ON  
M4P 1E4

Dear Ms. Marconi,

**RE: EB-2022-0079 Alternative Price Plans for Non-RPP Class B Consumers  
Dynamic Pricing Options for Non-RPP Class B Electricity Consumers  
CCMBC Comments**

At the September 9, 2024, Stakeholder Meeting OEB Staff invited participants to submit comments on the proposed alternative price plans. This comments of the Coalition of Concerned Manufacturers and Businesses of Canada (CCMBC) are in this letter. CCMBC has over 400 members, most but not all of which are small and medium sized manufacturers in Ontario. Many are Non-RPP Class B electricity consumers.

CCMBC compliments OEB Staff on the excellent work that they have done on this initiative. Following are CCMBC's comments on feedback questions.

*What are your initial thoughts upon hearing about these price plans?*

The members of CCMBC are diverse and have diverse energy needs. CCMBC hopes that the proposed price plans will allow some of them to reduce their electricity costs without the need to make large investments for new equipment. The instructions in Minister' letter to the OEB of November 15, 2021, make it clear that the objective of this initiative is to keep energy prices low.

*"The OEB has done extensive work studying dynamic pricing plans for Class B customers. As Ontario recovers from COVID-19-related economic hardships, we must find ways to support small businesses and give businesses the tools to keep energy prices low so as to not pass on those costs to consumers. I ask that the OEB work with the IESO to develop a plan to design and implement a dynamic pricing pilot to assess the benefits for non-RPP Class B customers."*

If manufacturers and businesses need to make investments in new equipment to take advantage of new pricing options, they may need to pass these incremental costs to consumers.

How effectively do the proposed alternative rate design options address the identified problem (i.e., GA costs on bills are not reflective of demand)?

CCMBC believes that the proposed rate design options effectively address the problem that the GA costs on bills are not reflective of demand. CCMBC supports customer choice that allows customers to select the alternative that works for them.

What additional factors or information should the OEB take into account as we develop our Price Design Report to the government?

As mentioned above, the OEB should consider all costs of implementation of alternative price plans including the cost of behind the meter investments that may offset any savings.

Are there any other alternative rate design options that the OEB should explore?

CCMBC has no proposals for alternative rate design options at this time.

What information or tools would non-RPP Class B consumers require to choose the most suitable price plan?

The OEB should develop a simple to use tool that would be available on the OEB website to allow customers to evaluate the impact of each rate plan.

What are the unique challenges and opportunities presented by offering Customer Choice to non-RPP Class B customers?

One of the challenges is that parties would try to layer on additional objectives such as advancing energy transition, installation of DER's, EV chargers, or implementation of preferential rates for First Nations, or for low income customers. All of these could increase costs and make it more difficult to achieve the objective of keeping energy prices low as directed by the Minister.

Respectfully submitted on behalf of CCMBC,

Tom Ladanyi  
Consultant representing CCMBC

cc. Jocelyn Bamford (CCMBC)  
Catherine Swift (CCMBC)