



By RESS

January 31, 2025

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
PO Box 2319  
2300 Yonge St., Suite 2700  
Toronto, ON, M4P 1E4

Dear Ms. Marconi:

**Subject:** EB-2023-0071, Electric Vehicle Integration (EVI) Initiative, Electricity Delivery Rates for Electric Vehicle (EV) Charging, Invitation for Stakeholder Comment on Revised Proposal

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Hydro Ottawa Limited (Hydro Ottawa) appreciates the invitation to comment on the Ontario Energy Board's (OEB) proposed Electricity Delivery Rates for Electric Vehicle Charging.

Please see Appendix A attached, which provides Hydro Ottawa's comments on the revised proposal for an Electric Vehicle Charging Rate, sent by OEB staff on January 7, 2025.

Hydro Ottawa appreciates this opportunity to provide comments and looks forward to continued dialogue with the OEB on this important initiative.

Sincerely,

Signed by:

*April Barrie*

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**April Barrie**

**Director, Regulatory Affairs**

**Directeur, Affaires réglementaires**

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## Appendix A

On January 7, 2025, the Ontario Energy Board (OEB) released an updated Electric Vehicle Charging Rate (EVC Rate) Overview - Draft Report which proposed rate structure rules. The EVC Rate aims to support the efficient integration of electric vehicles (EVs) in Ontario by reducing the Retail Transmission Service Rate consistent with a charging station's use of transmission assets.

This proposed rate structure is the product of an OEB Staff Discussion paper released in May 2024 that introduced the EVC Rate, and a consultation period where stakeholders provided feedback.

Hydro Ottawa appreciates the opportunity to provide feedback on the proposed EVC rates. To ensure accurate implementation, the utility requests further clarification from the OEB regarding customer eligibility criteria. Specifically, the utility requests clearer guidance on assessing and verifying that 90 percent of a customer's demand is attributable to EV charging.

### **At least 90% of the demand is for EV charging**

Hydro Ottawa is concerned about the enforceability of the OEB's requirement that 90% of a charging station's metered demand be for EV charging. Since meters cannot distinguish between EV charging or auxiliary loads, Hydro Ottawa cannot independently verify compliance, effectively relying on customer self-attestation.

Hydro Ottawa understands that the OEB has placed the onus of compliance on customers (as stated in the January 29, 2025, stakeholder meeting with Electricity Distributor Association members). Given customers are being provided an opportunity to reduce rates to encourage EV charging, the utility has an interest that customers are meeting eligibility requirements appropriately, as other ratepayers with the same load factor do not have the same opportunity despite having similar use of the grid.

To address the above concern, Hydro Ottawa proposes that EVC Rate customers attest on the declaration form what percentage of auxiliary load is included in the account in question.

### **EVC Rate Review**

Additionally, as per Hydro Ottawa's previous submission on this file, it is suggested that the OEB schedule an EVC Rate review period of three to five years. The electrical vehicle charging network is quickly advancing due to technology and policy changes. A review would allow the OEB to assess the EVC Rate program's success and to ensure that the rate continues to align with the industry's needs.