

March 21, 2025

Ms. Nancy Marconi
Registrar
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, ON M4P 1E4

Re: EB-2024-0300 – OEB Proposed RSC & SSSC Amendments to Support IESO Market Renewal Program

Dear Ms. Marconi:

On March 11, the Ontario Energy Board (OEB) issued a Notice of Proposal to amend the Retail Settlement Code (RSC) and Standard Supply Service Code (SSSC) to facilitate the implementation of the renewed market under the Market Renewal Program (MRP) which is anticipated to go live on May 1, 2025.

The Electricity Distributors Association (“EDA”) represents Ontario’s local distribution companies throughout Ontario, the companies that will be impacted downstream by the changes proposed to both the RSC & SSSC. To better prepare our members, we established an MRP Preparedness Group comprised of subject matter experts from our membership. The MRP Preparedness Group has been planning and collaborating with OEB staff and IESO staff since 2022 to prepare our billing and settlement systems to accommodate for changes related to Market Renewal. Through this working group we identified risks and challenges to electricity distributors and their customers far in advance and provided our comments and proposed resolutions in advance and anticipation of Market Rule amendments. This partnership proved successful, as we could comment on a set of draft materials nine months before the expected market renewal go-live date, rather than risk a bottleneck in the process and inform a set of accounting guidance impacts. **We would like to share our great appreciation to the OEB staff** for working in this valuable method in draft format, with our MRP Preparedness Group to provide as much lead time and preparation as possible.

We support the proposed amendments released on March 11. We suggest that the OEB clarify the terminology that should be used by LDCs to refer to the new hourly Ontario electricity price, which will be the sum of the IESO’s new Day-Ahead Market (DAM), Ontario Zonal Price (OZP), and the Load Forecast Deviation Adjustment (LFDA), on customer invoices and for settlement purposes. Specifically, **we suggest on behalf of our members that a new convention be used** to reflect and reference the new calculation for the electricity price. Our suggestions include Ontario Electricity Price, Ontario Electricity Commodity Price, or Ontario Electricity Market Price. It is our members’ opinion that **establishing a consistent naming convention will mitigate billing and market confusion** in the future for this bundling of DAM, OZP, and LFDA.

We commend the OEB staff on their actions taken to prepare LDCs in advance of the launch of Market Renewal.

If you have any additional questions regarding our comments or would like to discuss them in further detail, please contact Brittany Ashby, Senior Regulatory Affairs Advisor, at bashby@eda-on.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Wigdor", is centered within a light gray rectangular box.

T. Wigdor
Vice President, Policy, Government and Corporate Affairs