

From: [Office of the Registrar](#)
To: [Spencer Patterson](#)
Subject: FW: Redacted - Letter of Comment Submitted: EB-2025-0252
Date: Friday, November 7, 2025 10:15:36 AM

From: Ontario Energy Board <webmaster@oeb.ca>
Sent: Thursday, November 6, 2025 9:49 PM
To: Office of the Registrar <Registrar@oeb.ca>
Cc: Webmaster <Webmaster@oeb.ca>
Subject: Redacted - Letter of Comment Submitted: EB-2025-0252

LETTER OF COMMENT

Comments:

Dear Members of the Ontario Energy Board, I am writing as a resident and customer of Alectra Utilities to provide my feedback on their recent application for a rate increase EB 2025 0252. While I understand the need for utilities to invest in infrastructure and maintain reliability, I have significant reservations about the proposed hike and would like to suggest alternative approaches that could mitigate the impact on consumers.

- Request for a Reduction in the Overall Rate Hike.** The proposed increase comes at a time when many households in Ontario are already facing considerable financial pressure due to inflation and the rising cost of living. A significant rate hike would add an undue burden to families and seniors on fixed incomes. I strongly urge the Board to consider a reduction of the proposed rate hike by at least 10 percent. I encourage a rigorous review of Alectra application to identify areas where operational efficiencies or phased investments could lessen the immediate financial impact on ratepayers without compromising service quality or grid safety.
- Enhanced Time of Use TOU Structure to Incentivize Off Peak Consumption rather than a blanket increase.** I believe this is an opportunity to make the Time of- Use TOU system more dynamic and beneficial for consumers. The current Off Peak period 7 p.m. to 7 a.m. is too broad. I propose that the OEB and Alectra introduce a Super Off-Peak or Ultra Low Overnight rate tier within the existing off peak window. For example, a deeply discounted rate could be applied from 10 p.m. to 5 a.m. This would achieve several positive outcomes:
 - Consumer Choice and Savings:** It gives consumers a tangible way to offset the overall rate hike by shifting more discretionary loads, like EV charging, dishwasher, dryer, and pool pump operation, to these hours.
 - Grid Optimization:** It further flattens the demand curve overnight, which is beneficial for grid stability and can reduce the need for expensive peaker plants.
 - Support for Electrification:** This structure actively encourages the adoption of electric vehicles and smart home technologies by making their operation more affordable.
- Additional Suggestions Inspired by International Best Practices**
 - To further improve fairness and efficiency,** I encourage the OEB to consider models that have been successfully implemented in other jurisdictions:
 - Critical Peak Pricing (CPP):** Used in places like California and parts of Europe. Customers receive a day-ahead or same-day notification of a Critical Peak event e.g., a very hot summer afternoon. During these few hours per year, rates are significantly higher, but in exchange, rates for all other times are lower. This directly targets the most costly periods of grid stress.
 - Demand-Based Tariffs or Capacity Charges:** In some European countries e.g., Italy, France, a portion of the bill is based on the customer's highest rate of electricity use kW, not just total consumption kWh. This incentivizes consumers to avoid running all major appliances simultaneously, which is a major cost driver for the grid. Alectra has already moved in this direction with the Tiered plan, but a more refined model could be explored.
 - Targeted Rebates for Smart Appliances:** Programs that

offer rebates for Wi-Fi-enabled water heaters, thermostats, and laundry machines that can be automatically scheduled or controlled by the utility during peak times , with customer permission. This is common in the UK and the US and is a direct, technology-driven approach to managing demand. In conclusion, I urge the OEB to reject a simple, broad-rate increase. Instead, please direct Alectra to innovate with more granular and consumer friendly rate structures. A reduced overall hike, coupled with a Super Off Peak rate and the exploration of dynamic pricing models, would be a more progressive and equitable solution for Ontario's energy future. Thank you for considering my perspectives.

Name: Muhammed Rao

Do you reside in the impacted service area?: Yes