



July 28, 2020

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
27th Floor/ P.O. Box 2319  
2300 Yonge St.  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Implementing the Process for Enabling Customers to Opt Out of Time-of-Use Pricing,  
Halton Hills Hydro Inc.,  
Board File no. EB-2020-0152**

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Halton Hills Hydro Inc. (“HHHI”) appreciates the opportunity to comment on the proposed amendments to the Standard Supply Service Code (“SSSC”) in proceeding EB-2020-0152 – Implementing the Process for Enabling Customers to Opt Out of Time-of-use Pricing.

HHHI would like to make the following comments with respect to the proposed amendments to the Standard Supply Service Code (SSSC) that provide optionality rules to allow customers to switch between Two-tiered and Time-of-Use Regulated Price Plan (RPP).

1. Section 3.5.2 - *A distributor shall make available on its website a form for the notice referred to in section 3.5.1 and provide it directly to any consumer that requests it.*

HHHI would like to confirm that the form can be of the utility’s own design, providing it meets the intent of the form prescribed by the Ontario Energy Board (OEB) and collects all the required information. In creating an HHHI specific form, the utility is able to ensure that the questions and terms used are consistent with information HHHI customers are accustomed to seeing on their bills and that the terminology is consistent with that used by HHHI’s billing system to allow for processing automation.

HHHI agrees that a standardized set of communication, educational materials and comparison tools should be provided by the OEB.

2. Section 3.5.8 - *The bill message shall appear on the first bill issued to the RPP consumer under tiered pricing*

The requirement to provide a one-time only message will require programming changes for HHHI. Currently, HHHI’s billing system can provide bill messages to specific classes or groups of customers, but not to individual customers based on a one-time customer specific trigger. A



preferred approach would be to provide a notice to all customers receiving two-tiered pricing on an on-going basis.

Further information is required regarding the content of the specific bill message in order to comment on space issues that may occur with bill print requirements.

3. Section 3.5.10 b) - *(b) beginning to provide standard supply to an RPP consumer that is switching from a contract with a retailer;*

This section requires LDCs to contact customers who are switching to standard supply from a contract with a retailer to ask their pricing preference. Currently, for HHHI, the retailer enrollment and drop process does not involve any direct interaction between HHHI and the customer as it is handled through the automated EBT system. The process to identify customers who are dropping from retailer to RPP will be either entirely manual or require additional programming cost. Additionally, it will be challenging to identify and successfully contact customers in the limited time between receiving a drop request from a retailer and the system changes necessary to bill the customer appropriately.

It is HHHI's understanding that if a customer does not respond, the default billing will be time-of-use.

4. 3.5.11 - *A distributor shall allow an RPP consumer that is being charged tiered prices under section 3.3 as a result of an election under this section 3.5 to elect at any time to be charged time-of-use prices under section 3.4.*

HHHI believes that limits around how often a customer can switch between pricing options are a necessity. Due to the complexity and effort involved in switching customers and the reporting requirements, imposing a limit of up to four (4) times per year would be acceptable.

5. 3.5.14 - *A distributor shall rely on the Smart Metering Entity for the calculation of billing quantities in respect of all residential consumers or general service < 50kW consumers that are being charged tiered prices under section 3.3 as a result of an election under this section 3.5.*

HHHI would like to request clarification on this section and provide comment. If the Smart Metering Entity is providing billing quantities for customers on two-tier prices, HHHI would like confirmation that the 'periodic' billing response type will be provided, and not a new billing response type.

HHHI would prefer to elect the type of billing quantity it receives from the MDMR for billing. There are benefits to continuing to receive time-of-use pricing for customers who have opted out as this would enable a proper comparison for customers. If customers have the ability to continue to view their energy consumptions online, aggregated into time-of-use buckets, they will be able



to make a more meaningful comparison between the two pricing options to determine which option is best for them. LDCs will not be able to provide online RPP option comparisons if the LDC does not receive the time of use buckets. Without this ability, customers will not have the necessary and accurate tools to make informed decisions on optionality.

HHHI looks forward to continued discourse with the Ontario Energy Board on the details of the proposed amendments to the Standard Supply Service Code (SSSC) providing for optionality choice to allow customers to choose between Two-tiered and Time-of-Use Regulated Price Plan (RPP).

In the event of any additional information, questions or concerns, please contact Tracy Rehberg-Rawlingson, Regulatory Affairs Officer, at [tracyr@haltonhillshydro.com](mailto:tracyr@haltonhillshydro.com) or (519) 853-3700 extension 257.

Sincerely,

*Tracy Rehberg-Rawlingson*

Tracy Rehberg-Rawlingson  
Regulatory Affairs Officer, HHHI

Cc: Arthur A. Skidmore, President & CEO, HHHI  
David J. Smelsky, CFO, HHHI  
Kate Sweetman, Customer Care Supervisor, HHHI