



# Niagara On-The-Lake HYDRO

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July 28, 2020

Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27th Floor  
Toronto ON M4P 1E4

Attn: Ms. Kirsten Walli, Board Secretary

Re: EB-2020-0152

Dear Sirs:

The following are the comments of Niagara-on-the-Lake Hydro (NOTL Hydro) with respect to the proposed amendments to the Standard Supply Service Code to enable electricity customers to elect between time-of-use (TOU) and tiered pricing.

NOTL Hydro has only one comment on the proposed amendments and that relates to the Preparation of Billing Quantities by the Smart Metering Entity (SME). NOTL Hydro supports continuing to receive TOU billing quantities from the SME.

The OEB has argued that some distributors want “to continue to receive TOU billing quantities from the SME and apply the tiered pricing through their own processes, since it would enable them to keep a portion of their current billing processes unchanged”. At least as far as NOTL Hydro is concerned this is not the reason. The changes to the billing processes are similar in scope whichever way billing quantities are received from the SME.

NOTL Hydro is more concerned with how we support our customers in the future who have switched to tiered pricing and are considering moving back to TOU. To perform this analysis, and to make this decision, these customers will need to have access to TOU billing quantities. The best way to ensure this data readily exists is to continue to receive the data from the SME.

The OEB has also argued that it would like to receive tiered data from the SME so it can “monitor how customers respond to the choice of RPP pricing structures so that it can continue to set RPP prices that recover the cost of electricity over time”. The OEB has argued that this would be better than obtaining the information from the distributors which would mean fragmented data and more reporting requirements. NOTL Hydro believes this argument, while valid, is overstated. The OEB already has extensive reporting from distributors for the Yearbook, the Scorecard and other RRR purposes so adjusting the reported requirements to include this information would not be difficult. NOTL Hydro also notes that the very act of setting the TOU and tiered rates will likely result in customers shifting their billing option so the setting of these rates will now always have another element of uncertainty on top of those that already exist.



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In conclusion, NOTL Hydro believes that having the TOU billing data from the SME will continue to be needed in order to better serve our customers and NOTL Hydro hopes that the OEB will also put serving our customers first.

Yours truly,

Tim Curtis  
President  
tcurtis@notlhydro.com