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July 29, 2020

VIA RESS

Ms. Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, ON M4P 1E4  
Email: [BoardSec@oeb.ca](mailto:BoardSec@oeb.ca)

Dear Ms. Long:

**Re: Notice of Proposal to Amend the Standard Supply Service Code  
Ontario Energy Board File No: EB-2020-0152**

In accordance with the Board's letter dated July 15<sup>th</sup>, 2020, please find below Cornerstone Hydro Electric Concepts' ("CHEC") comments related to the Proposal to Amend the Standard Supply Service Code for the above-noted proceeding.

### **Coming into Force**

CHEC fully supports the Customer Choice initiative. CHEC would like to express their concerns with the proposed amendment timeline of October 13<sup>th</sup>, 2020. In discussing the required changes to the Customer Information System (CIS) it has been brought to our attention by our software developers that they are unable to start development, allowing customer choice, until the final regulations are released by the OEB. It is anticipated the final regulations will be available in mid-August and once available the CIS developers are able to start programming the changes required. Of note, this billing software supports 940,000 customers in Ontario.

The current timeline proposed does not allow adequate time to develop, test, and implement the new software changes. CHEC would like to propose our members start a manual intake process of customer election forms; however, this is also dependent upon November 1<sup>st</sup>, 2020 rates being available. Customers will not be able to assess the pricing structure they are better suited for if the rates are not made available until, historically, October 23<sup>rd</sup> (based on past five year's average of news release of winter RPP rate updates).

CHEC CIS software developers believe they will have a solution fully implemented for November 1<sup>st</sup>, 2020. Please keep in mind that this also assumes the new programming changes are tested and 100 per cent accurate. Delays in the final regulations being released will impact these timelines.

## **The Election Process**

### *Consumer Makes an Election*

CHEC agrees, that at a minimum, email and mail should be made available for customers to make an election. CHEC utility members will do their best to incorporate online and telephone elections to keep costs at a minimum.

CHEC supports and encourages the use of an OEB template election form, or a prescribed election form, allowing and maintaining consistency across the province for customers.

Regarding when the customer can choose tiered prices, CHEC agrees that when opening a new account, moving from a contract with an electricity retailer, or returning to RPP would require additional set up time, and should therefore not be subject to the requirements applicable to elections made at other times. CHEC would like to propose adding “customers moving within the territory” to this group. Customers moving within the territory are historically more complicated and time consuming to setup, risking the 10-business day completion requirement.

### *Distributor Notification to Consumer*

CHEC encourages the flexibility that the OEB is considering for the generic notification to the customer. CHEC member software developers believe they should be able to generate a notification to the customer that reads “customer will be switched over to tiered/TOU pricing on their next bill, for usage after the last meter read date of YYYY/MM/DD,” that would not cost additional funds. CHEC would like clarification whether this message would be sufficient in meeting the OEB requirements for a customer-specific message of when the switch would take place.

### *Consumer Election Implemented*

CHEC is in agreement with the proposed implementation change timelines.

### *Confirmation of Implementation*

CHEC believes that providing a bill message confirming the switch is redundant of the proposed *Distributor Notification to Consumer* and proposes to remove this requirement. CHEC would like to propose that this reporting requirement is removed due to the complexity of priority messaging that may bump this confirmation message.

## **Switching Back to TOU**

CHEC would like clarification on how often customers can opt out of TOU? Originally discussed in the working group were two times in a calendar year, plus the initial November 1<sup>st</sup>, 2020 election. If the switch to tiered is also unlimited, technically, a customer could switch between pricing structures every month. If a fully automated switching process is not attainable, this could restrict utility’s existing resources available to meet the timelines.

## **Information for Consumers**

Regarding creation of customer materials and tools to support customer decision making, CHEC members believe that this should be created at the OEB level. By having these centralized communication materials and tools created and available by the OEB, this will:

- enable a consistent and predictable province-wide customer experience and maintain consistency in how the potential savings are being calculated,
- align timing of availability of the materials and calculator for all customers in Ontario, and
- keep costs down in the province (these are not built into the customer portals right now and will take time and money to build).

LDCs are already under critical pressure/timelines for the implementation of TOU Customer Choice. The creation of LDC specific, behind the portal customer calculators (and likely a fulsome digital customer engagement strategy will be required) to allow the consumer to make an informed choice, will potentially delay roll out as the development and testing takes additional time.

### **Preparation of Billing Quantities by the Smart Metering Entity**

CHEC member utilities would prefer to continue receiving billing data back in the same format that they are currently receiving for TOU billing buckets.

Reasons are as follows:

- CHEC members would like to keep the ability to see TOU data in their systems and be able to provide readily available comparable data to their customers. We understand that the information will still be available on the web portal; however, it will cost additional funds to automate a process to retrieve this information and bucket it to use for comparative purposes.
- Building the functionality to accept the new billing data into the CIS will raise costs, as a new framing structure needs to be built.

To keep costs down and meet the November 1<sup>st</sup>, 2020 timeline, CHEC recommends keeping the framing structure as it is now. The LDCs are reporting, monthly, on how many of their customers are on tiered and TOU; therefore, the OEB will continue to receive this information.

Please feel free to reach out if you require additional information or if CHEC can further elaborate on the comments above.

Sincerely,

*Original signed by Ashly Karamatic*

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