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**Frank D'Andrea**

Vice President, Reliability Standards and Chief Regulatory Officer

BY EMAIL AND RESS

July 29, 2020

Ms. Christine E. Long  
Board Secretary  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Long,

**Re: Notice of Proposal to Amend the Standard Supply Service Code - Ontario Energy Board  
File Number: EB-2020-0152**

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On July 15, 2020, the Ontario Energy Board (“OEB”) gave notice of proposed amendments to the Standard Supply Service Code (“SSSC”) to enable electricity consumers on the Regulated Price Plan to opt out of time-of-use (“TOU”) prices and elect to be charged on the basis of tiered pricing. Hydro One Networks Inc. (“Hydro One”) appreciates the opportunity to provide comments on the proposed amendments.

Overall, Hydro One is supportive of the steps being proposed by the OEB to support customer choice as this has been a long standing request of its customers. As outlined below, Hydro One encourages the OEB to reconsider some of its proposed requirements related to customer notification and notification delivery mechanisms in order to enable a more cost effective implementation and more beneficial customer experience.

SSSC Section 3.5.5: Requirement for Confirmation Notice

Hydro One encourages the OEB to consider eliminating the proposed requirement in section 3.5.5 of the SSSC for a separate customer notification confirming a pending rate switch. Instead, Hydro One proposes that the SSSC require confirmation of initial receipt of the notice from the customer with further proactive notification only required in the event that the requested switch will not occur on the next bill cycle. Hydro One notes that the election intake processes/forms can be structured so that it is clear that the implementation of customer choice is intended to occur on the next billing cycle and that the customer will only be notified in the event that the application is

deficient or that implementation cannot be accommodated, as planned. This approach will avoid unnecessary communication to the customer along with the associated costs to build and administer that communication.

#### SSSC Section 3.5.6: Notifications to Customers

The proposed amendments to section 3.5.6 of the SSSC would require that utilities deliver notifications to customers using the same method of delivery used by customers to give notice to the utility. Hydro One believes that the proposed wording is unnecessarily restrictive and may unintentionally result in higher costs. A practical example of such a circumstance could occur if a utility were to elect to procure an online self service portal for customers to provide their notice under section 3.5.1 of the SSSC. Under the proposed wording, the utility would be required to design a portal that has the functionality to track the status of the review of the customers election and respond back to the customer through the portal rather than leveraging existing systems/methods to track and communicate back to the customer (e.g. automated e-mails). Hydro One encourages the OEB to make the communication framework more flexible to allow utilities leeway to use the most effective and cost efficient communication tactics for their customers. Hydro One proposes that section 3.5.6 be revised to remove the second sentence as follows:

3.5.6 A notification under section 3.5.3 or 3.5.5 shall comply with any form as may be approved by the Board. Where the notification is given by telephone the call must be recorded.

#### SSSC Section 3.4.14: Preparation of Billing Quantities by the Smart Metering Entity (“SME”)

Hydro One supports the need for the ongoing delivery of the hourly consumption data to the SME from both TOU and 2-tier customers to support broader provincial and regulatory needs but, encourages the OEB to reconsider the requirement that utilities change their billing and SME synchronization systems to use the “MDMR’s Periodic Framing Structure” to support ongoing billing of customers that opt into tiered pricing. Utilities already receive all the data elements needed to bill a customer on tiered pricing (e.g. TOU buckets as well as Index reads) from the SME. Leveraging the existing data flows requires that Hydro One only focuses its effort on modifying its Customer Information System to support billing configuration changes and customer choice selection and tracking. In contrast, a requirement to leverage the “MDMR’s Periodic Framing Structure” will require a significantly larger investment and the development of a whole new set of parallel interfaces and data synchronization capabilities to mirror the processes and complexities already in use for the SME’s “TOU framing structure”. Hydro One recognizes that there is a desire for insights on which customers are on which pricing structure to meet broader

needs but encourages the OEB to consider other offline reporting options that may be more cost effective and much simpler to implement.

Please do not hesitate to contact me further in respect of this matter.

Sincerely,

A handwritten signature in cursive script that reads "Frank D'Andrea".

Frank D'Andrea