



By RESS

November 8, 2022

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
PO Box 2319  
2300 Yonge St., Suite 2700  
Toronto, ON, M4P 1E4

Dear Ms. Marconi:

**Subject: Notice of Proposal to Amend SSSC and RPP Manual - OEB File No. EB-2022-0160**

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Hydro Ottawa Limited ("Hydro Ottawa") appreciates the opportunity to submit feedback on the Ontario Energy Board's (OEB) Notice of Proposal to amend the Standard Supply Service Code (SSSC) and Regulated Price Plan Manual (RPP Manual) to implement a new optional ultra-low overnight (ULO) price plan for electricity consumers on the Regulated Price Plan (RPP).

Hydro Ottawa is a licensed electricity distributor serving approximately 353,000 customers in the City of Ottawa and the Village of Casselman. Hydro Ottawa is committed to delivering value across the customer experience by providing reliable, safe and responsive services to its customers.

As a whole, Hydro Ottawa is supportive of the proposal to amend the SSSC and the RPP Manual which has the potential to incentivize electricity usage behavior which is beneficial to the electricity system. Hydro Ottawa provides the following comments for consideration in order to add to the customer experience and facilitate understanding of the price plan options.

The presence of two different peak periods for the Time of Use (TOU) rate plans may appear to be counterintuitive to customers given the objective is to reduce the provincial peak. Therefore, it is proposed that messaging associated with the TOU rate plans also speak to the system and consumer benefits of off-peak and mid-peak consumption periods in both the short and longer term. In terms of pricing, the Mid-Peak and Off-Peak are equivalent under both TOU and ULO plans however, the On-Peak is significantly higher. Maintaining the same label of "On-Peak" could create considerable confusion for customers and make related discussions with customers more challenging. The provision of clear and distinctive labels for the individual rate periods could help customers differentiate peak periods. In addition, effective customer



education materials and support will enable customers to make a more informed decision as to which rate plan is most suitable for them.

As proposed in the SSSC section 3.4B, Local Distribution Companies (LDCs) will need to offer the ability for customers to choose to opt in to ULO by October 13th, however, the November 1st RPP rates are typically released after this date. Should this continue to be the case, customers will not have all the information they need to make an informed decision.

Currently, the provincial MDM/R cannot accommodate rate optionality for net metering customers, and therefore those customers are only eligible for tiered commodity rates. Should it become a requirement that LDCs offer rate optionality to net metering customers, Hydro Ottawa requests that the OEB provide significant lead time to be able to implement the required enhancements to its customer information system and supporting systems.

Hydro Ottawa appreciates this opportunity to provide comments and looks forward to continued dialogue with the OEB on this important customer initiative.

Sincerely,

DocuSigned by:  
*April Barrie*  
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**April Barrie**

**Director, Regulatory Affairs**

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