



March 17, 2023

**VIA RESS**

Ontario Energy Board  
**Attention: Registrar**  
P.O. Box 2319,  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Marconi,

**Re: Enabling the Implementation of an Ultra-Low Overnight TOU Price Plan  
Board File No.: EB-2022-0160**

We are counsel to the Electric Vehicle Society (“**EVS**”) in connection with the consultation on enabling the implementation of an Ultra-Low Overnight (“**ULO**”) Price Plan (the “**Consultation**”). EVS is pleased to submit these comments further to the Board’s letter dated March 7, 2023.

**About EVS**

EVS represents over 1,000 end-use, largely residential, individual electric vehicle (“**EV**”) electricity customers, which register as members to have their needs and preferences related to EVs and related distributed energy resources (“**DERs**”) represented on matters that directly substantially impact them. EVS has 12 local chapters of electricity rate paying customers in Ontario and is governed to ensure that individual rate payers are informed, consulted, and can independently raise their needs and preferences on matters of direct and substantial interest with the leaders of their local EVS chapters, and all such needs, preferences, and member input are communicated to and through the board of directors and the President of EVS, including through various committees. Further information on EVS, its more than 1,000 individual residential rate paying members, and its programs and activities may be found on its website at [www.evsociety.ca](http://www.evsociety.ca).

**Comments**

EVS appreciates the opportunity to provide comments on proposed revisions to disclosure statements, price comparison templates, and the instructions for completing price comparisons. EVS is generally supportive of enabling ULO Time-of-Use pricing and ensuring that energy consumers and EV owners in Ontario are provided options that best meet their needs related to reliability, cost, and incentivising energy use that provides cost-effective system and consumer benefits. EVS continues to support the Board’s recognition of the importance of addressing on- and off-peak energy demand and the fundamental changes in energy use being faced in Ontario as a result of the ongoing and persistent transition to work-from-home for many Ontarians. The Board should ensure that energy consumers are aware of when daytime peak prices occur and how shifting demand and energy use to the ULO pricing may impact their energy costs. EVS

submits that this will provide greater customer choice and ensure that consumers make informed decisions about their energy use and sources of energy.

EVS is generally supportive of the proposed revisions to the disclosure statements, price comparison templates, and the instructions for completing price comparisons, as they provide a necessary level of price transparency for customers that may consider entering into an energy contract with a licensed energy retailer and/or a power purchase agreement.

EVS recommends that price comparisons provided to potential participants in the ULO pricing plan take into account energy consumers that use EVs and other DERs and how this may impact the amount they pay for electricity under the different pricing models. EVS supports increased transparency in anticipated or potential savings as a result of using ULO pricing, as this is likely to encourage customers, where practical and possible, to shift their demand to the lowest price option, thereby providing benefits to the entire grid.

Sincerely,

A handwritten signature in black ink, appearing to be 'Lisa (Elisabeth) DeMarco', with a long, sweeping horizontal stroke extending to the right.

Lisa (Elisabeth) DeMarco

c. Wilf Steimle, EVS