



October 6, 2023

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

Dear Ms. Marconi,

**RE: Ultra-Low Overnight Time of Use Pricing  
Chapleau Public Utilities Corporation – Exemption Request.**

The Standard Supply Service code requires electricity distributors to provide eligible customers the option to elect to be charged on the basis of ultra-low overnight time-of-use pricing (ULO) for any billing period that begins on or after November 1, 2023.

As one of the smallest utilities in the province, Chapleau Public Utilities Corporation (CPUC) has been challenged with balancing ongoing regulatory requirements, and due to staffing shortages, Hydro One was asked to manage the day-to-day operations of CPUC distribution business. The OEB granted an interim license to Hydro One effective June 13, 2023, to allow the Township of Chapleau, and Chapleau Hydro to evaluate longer-term options with the expectation of a permanent solution at the end of this interim period, currently November 23, 2023.

As no prior plan had been put in place by CPUC to allow for ULO rates to its customers by the November 1, 2023, deadline, a license amendment is requested.

### **License Amendment for ULO Exemption Request**

CPUC seeks an order of the Board amending CPUCs electricity distribution license to reflect an exemption from Sections 3.4A and 3.4B of the Standard Supply Service code requirement for electricity distributors to provide eligible customers the option to elect to be charged on the basis of ULO. The request is pursuant to section 74 of the Ontario Energy Board Act, 1998 (the "Act") where the amendment is in the public interest, having regard to the objectives of the Board and the purposes of the Act. The current barriers and concerns are highlighted below:

- As CPUC has no plan in place to implement ULO, the current November 1, 2023, time constraint for finding a solution is unattainable.
- CPUC has a long-outdated CIS system that would first require major changes to allow for any further planning of ULO. Their system is being supported by a single external individual who is the only person that knows how to program and make changes. Additionally, any major system updates pose the risk of breaking current functionality and billing system. Moreover, a lack of staff with specific knowledge constitutes risks

with testing any changes. CPUC has not had the staffing resources required to plan, procure, implement, or support a new billing system.

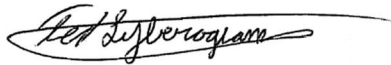
- With the Township looking at the option of selling the distribution business, any costs incurred at this time would not be prudent as the ~1,200 customers would be merged into an acquiring company's existing ULO-ready billing system.

This exemption is requested to allow CPUC, Chapleau Township, the OEB, and Hydro One, adequate time to develop a reasonable outcome for a merger or acquisition by another Utility and the merging of current CPUC customer billing into a CIS already capable of providing the required ULO functionality.

For these reasons, CPUC requests an amendment to their electricity distribution license to reflect an exemption from Sections 3.4A and 3.4B of the Standard Supply Service code requirement for ULO.

Please do not hesitate to contact me to request any further information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ted Lyberogiannis", with a long horizontal flourish extending to the right.

**Ted Lyberogiannis**

General Manager  
Chapleau Public Utilities Corporation  
[Ted.Lyberogiannis@HydroOne.com](mailto:Ted.Lyberogiannis@HydroOne.com)