

FEEDBACK FROM THE BALSAM LAKE COALITION

Presentation #1: Elimination of the Seasonal Rate Class

Feedback and Discussion

Do you have any questions of clarification on the presentation?

1. *Consider the two bill impact mitigation options presented. Are there other bill impact mitigation options you would like to see Hydro One consider? If so, what are they?*

BLC strongly believes that a subset of the seasonal customers that are being migrated to the R2 class likely qualify for the RRRP credit based on the criteria within Ontario Regulation 442/01, which, if applied, would mitigate their total bill impact significantly. It does not appear to BLC that HONI has considered this probability and taken steps to provide a process for determining which customers would properly qualify for the RRRP credit.

2. *Consider the pros and cons related to the bill impact mitigation options. Do you have any additions and/or suggested edits to the list of pros and cons identified?*

One major con with respect to the options that rely on increasing the volumetric charge in order to mitigate the impact on low volume seasonal customers moving to R2 is that such a methodology is contrary to the stated Board policy of eliminating volumetric based charges for residential customers.

3. **Which bill impact mitigation option do you prefer?**

BLC prefers a bill mitigation proposal that fully transitions customers to their new rate class and then mitigates the impact through the application of a credit that declines over time. However, contrary to what is proposed in option 1, BLC believes that under the circumstances it would be most appropriate for all rate classes to fund the proposed credit, rather than only the former seasonal customers.

4. **Do you have any other advice for the Hydro One team as they develop their August 4th report to the OEB?**

Former seasonal customers that are being moved into the R2 rate class are being grouped with customers that have enjoyed the benefit of a RRRP credit; so far as BLC can tell HONI is not intending to take any significant action to clarify for migrating customers precisely what the legal criteria for RRRP eligibility is, or provide any enhanced process during the transition from one rate class to another to properly screen new R2 customers for RRRP eligibility. BLC strongly urges HONI to consider taking steps to clarify for its customers to whom the regulation properly applies, and provide new R2 customers an explicit opportunity to establish that they qualify for the credit.

FEEDBACK FROM THE BALSAM LAKE COALITION

Presentation #2: Bill and Meter Reading Scenarios

Feedback and Discussion

Do you have any questions of clarification on the presentation?

1. *Consider the three bill and meter reading scenarios presented. Are there other scenarios you would like to see Hydro One consider? If so, what are they?*

2. *Consider the pros and cons related to the bill and meter reading scenarios. Do you have any additions and/or suggested edits to the list of pros and cons identified?*

3. **Which bill and meter reading scenario do you prefer?**

In theory BLC supports the availability of billing and meter reading scenarios that meet customer preferences, whatever those preferences are; however BLC remains concerned that current OEB policy dictates that for customers for whom monthly meter reading and billing is, within reason, possible, monthly meter reading and billing is required, such that some of the proposals from HONI would be contrary to Board policy.

4. **Do you have any other advice for the Hydro One team as they develop their August 4th report to the OEB?**

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1. *Consider the two bill impact mitigation options presented. Are there other bill impact mitigation options you would like to see Hydro One consider? If so, what are they?*

If, for example, ALL rate classes benefited from the seasonal rate class that was previously overpaying – Hydro One states in its presentation on page 6 that revenue from the seasonal rate class exceeded costs – then the costs of moving those seasonal customers should be born by all ratepayers. This would have the positive effect of mitigating the bill impact of eliminating the seasonal rate class on those customers most effected. Would Hydro One consider applying the costs of eliminating the seasonal rate class to all other classes?

Second, would Hydro One consider offering seasonal customers the option to pay upfront the cost of eliminating the rate class? For example, under option 1, formerly seasonal ratepayers that are moving to R1 would be debited an amount each month in order to pay for the credits offered to those customers moving to R2. If these new R1 ratepayers didn't pay those credits, according to Hydro One's research on page 12 of the handout, they would see a significant bill reduction. Would Hydro One consider allowing these customers the option to pay, up front, all of the monthly debits that would be billed to them? Would it consider offering them a discount to do so? Some customers may be preparing for retirement and might like the option of paying the cost now before they move to a fixed income.

2. *Consider the pros and cons related to the bill impact mitigation options. Do you have any additions and/or suggested edits to the list of pros and cons identified?*

The biggest drawback is that ratepayers in certain classes, such as the UR, R1 and R2, who may have benefited from the seasonal class (as that class brought in more revenue than it cost to serve them), now don't have to pay for the cost or mitigation measures that occur once that rate class is eliminated. If that is the case (that all ratepayers benefited for the seasonal class), Hydro One should consider charging all ratepayers for the cost of eliminating the seasonal rate class.

Also, Option 1 presents a particular problem. Under that plan, the seasonal customers that were previously paying too much – or cross subsidizing other ratepayers in their class – are now being charged for the benefit of moving out of the class. If, for example, you were a medium to high volume ratepayer in the R1 density class, but were paying seasonal rates, you were, essentially, overpaying for your services. Once you move to the R1 class with the elimination of the seasonal rate class, you will be charged monthly debits in order to mitigate the impact on those former seasonal ratepayers who were previously underpaying. Is that fair? Should one ratepayer class have to pay for the privilege of no longer cross subsidizing another?

3. **Which bill impact mitigation option do you prefer?**

Hydro One has recently had very bad publicity regarding its billing system. In the wake of that publicity, Option 1 might present further billing complications and customer dissatisfaction. Additionally, Option 1

would be difficult for many customers to understand. The Board has repeatedly tried to make bills less complicated and this option seems to reverse that work.

Option 2 is much easier to explain to ratepayers, so would be preferred. Would Hydro One consider expanding Option 2 to ALL rate classes? This could both shorten the time of the phase-in period as well as mitigate the potential bill impacts.

4. Do you have any other advice for the Hydro One team as they develop their August 4th report to the OEB?

I understand Hydro One is eliminating the seasonal rate class at the request of the Board, but it needs to fully detail to the Board how much of an impact it will have on ratepayers' bills when combined with the fixed charge proposal. Furthermore, Hydro One should also detail the impact of those charges when combined with – at the minimum – inflationary increases in other components of the bill. Will these charges have a material impact on Hydro One's load forecasts over the next three years (the length of its current rate application)? Does Hydro One expect these increases to result in cancelled services? Will Hydro One consider these many increases when preparing its next rate application?

Is Hydro One fully prepared to deliver bills to its customers that will be increasing, in percentage terms, by double digits, possibly even triple digits (if mitigation measures weren't put in place)? Some ratepayers could see the distribution portion of their hydro bill increase by 85% (prior to mitigation measures) combined with high single digit increases in transmission and generation. Taken together, their monthly bill could be DOUBLE its current level. Hydro One needs to fully detail these impacts when it prepares its final report for the Board.

And finally, will Hydro One present a detailed plan on how they will explain these changes to effected customers? It's no secret that bill increases are the number one concern among ratepayers. Under this proposal, a significant number of ratepayers will experience near double digit bill increases or more in the years to come – and that's not considering other components of the bill that are also expected to increase. Is Hydro One preparing a detailed program to deal with how customers will react to these changes?

Presentation #2: Bill and Meter Reading Scenarios

Feedback and Discussion

Do you have any questions of clarification on the presentation?

1. *Consider the three bill and meter reading scenarios presented. Are there other scenarios you would like to see Hydro One consider? If so, what are they?*
2. *Consider the pros and cons related to the bill and meter reading scenarios. Do you have any additions and/or suggested edits to the list of pros and cons identified?*
3. **Which bill and meter reading scenario do you prefer?**
4. **Do you have any other advice for the Hydro One team as they develop their August 4th report to the OEB?**

Sent via email to: regulatory@HydroOne.com



June 19, 2015

Attention: Erin Henderson
Sr. Regulatory Coordinator, Regulatory Affairs, TCT-07
Hydro One Networks Inc.

Regarding the Stakeholder Session for the Elimination of the Seasonal Rate Class Implementation Plan, June 10, 2015. For Approval of Distribution Rates 2015 to 2019 - EB-2013-0416

Dear Erin,

The Federation of Ontario Cottagers' Associations (FOCA) represents 50,000 property-owning families in Ontario through our 500+ member associations. The FOCA Board of Directors wishes to offer the following feedback and discussion, as requested by Hydro One, in its "Options Presentation."

The FOCA Board has reviewed the presentation materials from the June 10th Stakeholders Session, where options have been developed to mitigate the changes related to the elimination of the Seasonal Rate Class and the reclassification of the Seasonal customers primarily into the R1 and R2 Classes.

FOCA understands and accepts the principle of "user pays" as it relates to electrical delivery costs. But FOCA cannot accept and will vigorously object to a plan that would see some of its' members receiving a total bill increase of over 200%, which will result when the separately planned all-fixed delivery charges program is put in place. Across North America, electrical distribution costs are charged to residential customers almost universally as a combination of fixed and viable components. The dramatic effect of moving from 40% fixed to 100% fixed results in tremendous bill increases to many of the existing Seasonal class members who are reclassified into the R2 class, especially those using little or no electricity during the off-season months. In many cases, with these changes, these residents will be paying more for electrical power than they pay in property taxes. Many are pensioners or on a fixed income and can simply not afford these changes.

In any case we believe that any proposed changes to address the "rate class gap", many decades in the making, must be phased in over a reasonable period, perhaps 10 or 15 years.

The 100% fixed delivery charge results in a change from the current relationship between R1 Class customers and R2 Class customers where delivery includes a fixed component of \$26/mo (all amounts approximate) for R1 and \$66/mo (reduced to \$34 by RRRP) for R2 to the new plan's R1 \$30+ and R2 \$117. This change results in an incredible difference between R1 and R2. Seasonal customers will be reassigned to R1 or R2 on a density basis. As there are almost the same number of customers going to each class, there will be many situations where reassigned Seasonals will have close neighbours, family and friends with the alternate reclassification and significantly different bill ramifications. There will be many unhappy customers created by this plan. By way of example, there may be a lake where one shoreline has a customer density of 14 per kilometre of circuit and the other side has 16 per kilometre. Having only two rate classes results in profound bill differences of similar customers. More rate classes could reduce this problem.

Ontario's rural and waterfront property owners expect and deserve a fair and reasonable and understandable rate structure.

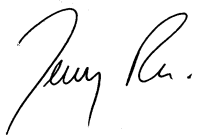
One additional and significant negative effect of all-fixed delivery costs is that it renders conservation programs less effective. Customers save less money by investing in conservation practices and equipment, and lose interest. This is counter-productive for the environment and puts pressure on the electrical utility to build new electrical generation infrastructure – and is further counter to the Province's "Conservation First" approach.

FOCA recognizes that the rural areas may be more costly to serve than urban areas. However, it is unacceptable that R2 some customers receive a RRRP subsidy under Regulation 442/01 funded by all other customers to reduce their distribution cost. Rural residents incur the same costs of living no matter the number of days or months they are resident at their address. For their part, "seasonal" residents provide significant economic contributions in their rural communities, in terms of local consumer activity, and job creation. "Permanent" and "Seasonal" residents deserve the same consideration in terms of mitigating the higher costs of rural living.

In summary, FOCA is generally supportive of Hydro One's recommended bill impact mitigation Option 1 and metering/billing Scenario C. However, it cannot accept the combination of 1) reassignment into one of only two rate classes with widely differing bill consequences; 2) all-fixed delivery cost billing; and, 3) lack of fairness in an existing subsidy program intended for only a select group of rural property owners.

Thank you for your attention. We appreciate the opportunity to provide you with our feedback.

Sincerely,



Terry Rees, Executive Director, FOCA



Ken Grant, President, FOCA

cc: Kirsten Walli, OEB, boardsec@ontarioenergyboard.ca; Ian White, FOCA