Ontario

MINISTRY OF
ENERGY

Ontario's Fair Hydro Plan (OFHP) Electricity Bill Requirements

May 2017

Contents

Summary

- On March 2, 2017, the government announced Ontario's Fair Hydro Plan (OFHP), which will lower electricity rates for households and small businesses by an average of 25 percent.
- Local Distribution Companies (LDCs) must implement backend system changes to ensure that eligible residential customers receive the applicable OFHP rebates/lower charges by the mandated deadlines (May 1, 2017 or July 1, 2017).
- LDCs will also need to make billing system changes such that electricity bills are updated to reflect OFHP initiatives and customers are informed about the resultant bill impacts.
- Based on feedback from LDCs, the Ministry recommends introducing OFHP bill messaging requirements in stages (e.g., voluntary bill inserts followed by mandatory bill inserts and on-bill messaging), so that LDCs can focus on providing OFHP-related savings to their customers on-time.
- The Ministry believes there is also an opportunity to revise the regulatory framework on bill presentment to improve the value of bills to all consumers. As part of a proposed Redesign Action Plan (RAP), the Ministry would convene with LDCs in Summer 2017, once OFHP initiatives are implemented, to seek feedback on changes to bill presentment. The aim would be to propose regulatory amendments in Fall 2017.
- Hydro One is also moving forward with plans to introduce a redesigned electricity bill in the near term. The Ministry has reviewed a mock-up of Hydro One's redesigned bill, which they wish to pursue but are constrained by current regulations.
- In light of this proposal, the Ministry plans to exempt Hydro One from current billing regulations (O. Reg. 275/04, 364/16) as of July 1, 2017. This exemption would allow them to proceed with their planned bill redesign in Fall 2017, while the Ministry consults on the topic.

OFHP Messaging – Proposed Timeline

- Based on feedback received from LDCs, the Ministry recommends introducing OFHP messaging requirements in the following stages:

Pre-July 1, 2017 OFHP Bill Inserts

- LDCs to voluntarily issue OFHP bill inserts in late June ahead of finalized OFHP regulations.
- ENERGY to provide LDCs with printed and translated bill inserts in late May.
- ENERGY to send LDCs a letter indicating that the requirement to issue "8% rebate" envelopes has been repealed.

July 1, 2017 OFHP Required Messaging

- OFHP regulations introduced requiring LDCs to comply with the following by July 1:

1. Issue prescribed OFHP bill inserts on a quarterly basis for a period of one year;
2. Include standardized OFHP on-bill messaging;
3. Introduce an FNDC line item, where applicable; and
4. Remove outdated line items and messaging (e.g., 8% rebate).

- Hydro One exempted from O. Reg. 275/04 and 364/16.

July-Sept. 2017 RAP Consultations

- ENERGY to convene LDC Working Group in July once OFHP initiatives have been implemented.
- ENERGY to seek feedback from LDCs on the changes they would like to see to bill presentment, as well as possible dynamic OFHP messaging.

Fall/Winter 2017 RAP Regulatory Amendments

- Following consultations, ENERGY to introduce regulatory amendments to simplify bill presentment in Fall 2017.
- Hydro One to introduce unconstrained redesigned electricity bill.

2018 Implementation

- Regulatory amendments to billing regulations become effective as of January 1, 2018.
- LDCs will require time to comply with requested changes.

Decision points

- Confirm bill insert and on-bill messaging
- Hydro One exemptions
  - Exempt from Fair Hydro Planning messaging?
  - Exempt from renaming electricity line items?
- 8% envelope requirements
  - Do a Minister’s regulation to revoke requirements
- Bill redesign
  - Should the WG include other entities other than LDCs?

Pre-July 1, 2017

Near-Term OFHP Messaging

- As a result of feedback received from the LDC working group in March/April 2017, the Ministry is proposing minimal near-term OFHP bill messaging to ensure LDCs can provide OFHP programs on-time for consumers.
- Following the regulatory posting in May, LDCs will receive a letter from the Minister asking them to distribute a bill insert in June 2017 explaining OFHP initiatives and savings to consumers.
  - Distribution of this insert will be done on a voluntary basis as OFHP regulations will not come into force until July 1, 2017.
  - However, the LDC working group indicates LDCs are keen to communicate OFHP programs/savings to their customers as soon as practicable, therefore decent compliance is expected.
  - In addition, the Ministry has agreed to provide LDCs with printed/translated copies of the bill insert in advance of their desired mail-out date for June.
- The Ministry will also repeal the section of the Minister’s regulation (see O. Reg. 364/16) requiring LDCs to issue envelopes marked with “8% provincial rebate”. LDCs will be requested via the Minster’s letter to refrain from issuing these envelopes to customers, so as to avoid confusion.

Voluntary OFHP Bill Insert

- The following bill insert messaging has been developed for the June 2017 bill insert:

Ontario's Fair Hydro Plan

- *Electricity bills would be lowered by 25 per cent on average for residential consumers*
- *Rate increases would be held to inflation for four years*
- *As many as half a million small businesses and farms would also benefit from this reduction*
- *Lower-income Ontarians and those living in eligible rural communities would receive even greater reductions, as much as a 40 to 50 per cent cut*

The benefit would vary for individual consumers depending on electricity usage and service territory. These measures include the eight per cent rebate introduced in January 2017 and build on previous initiatives to deliver broad-based relief on all electricity bills.

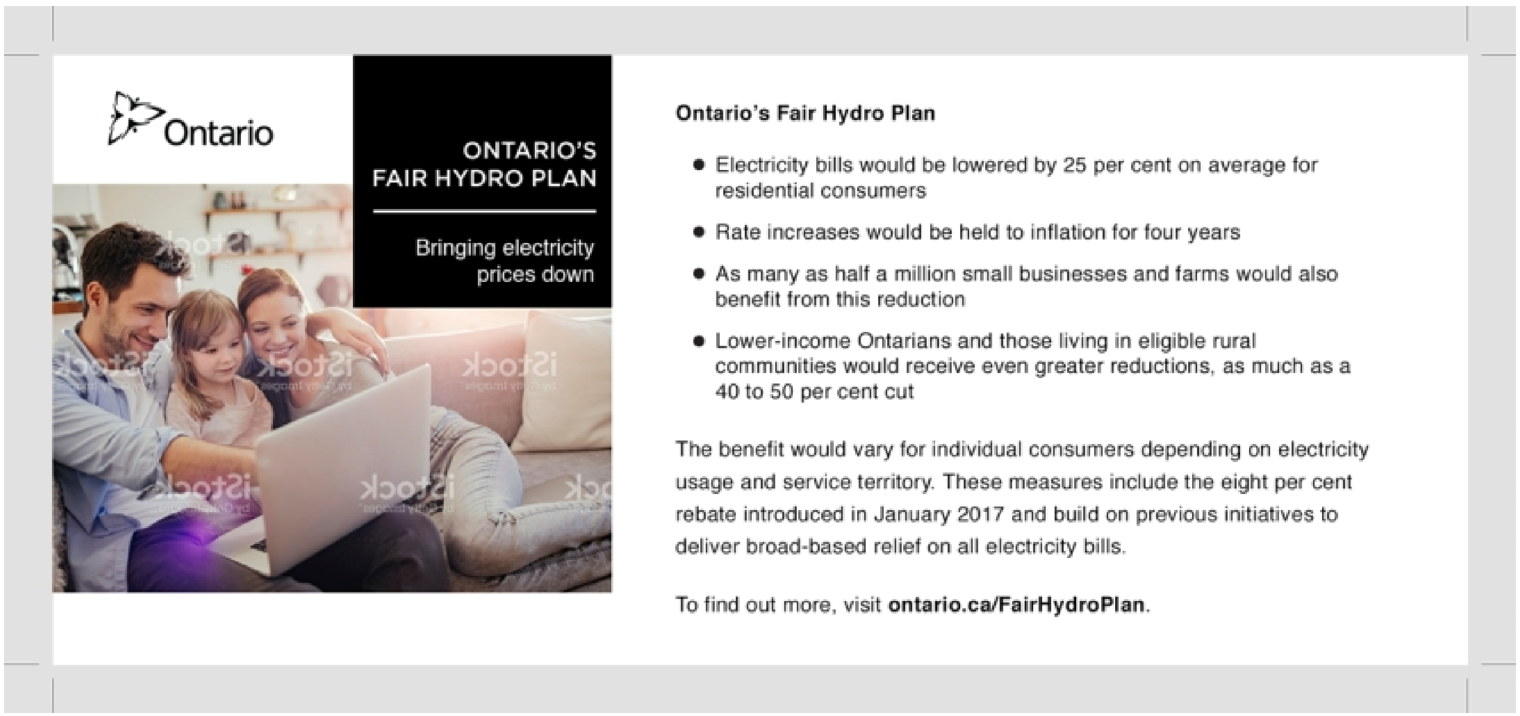
To find out more, visit ontario.ca/FairHydroPlan.

Messaging Considerations:

- Legislative counsel has reviewed and approved this proposed language.
- LDCs are required to deliver the OEB's mandated price insert in May, which the LDC working group advises could delay the distribution of OFHP bill inserts until late June.
- Some LDCs have indicated they are considering including their own bill inserts to explain OFHP social programs, which could include substantial bill impacts, to their customers.

Voluntary OFHP Bill Insert – Potential Design

- Below, for discussion purposes, is the potential graphic treatment proposed for the insert.
- Note that the image could be changed, as could the tagline in the box.
- CO/PO could have suggestions for approach as well.



Ontario

ONTARIO'S
FAIR HYDRO PLAN

Bringing electricity prices down

Ontario's Fair Hydro Plan

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Near-Term Communications Strategy with LDCs

Strategy:

- To complement the broader communications strategy around OFHP, and in recognition that LDCs will be the first point of contact for customers once bills are reduced through the Plan, the Ministry is proposing a series of supports for LDCs.

Tactics:

- Products for LDCs will include:
  - FAQ for front line staff
  - Backgrounders on FHP initiatives
  - Relevant news releases
  - Status updates on the progress of FHP initiatives
- Products for LDC customers will include:
  - Optional and legislated bill inserts
    - Approximate cost to print and distribute bill inserts $65K
  - Optional FHP matte content for local media, customer newsletters and websites
  - Optional Digital assets for sharing – social, online creative
- Development and distribution of OFHP initiatives will align with the proposed implementation schedule.
- Leverage Electricity Distributors Association (EDA) for distribution of products.

July 1, 2017

Regulatory Review of On-Bill Requirements

- Before new OFHP on-bill messaging can be introduced, outdated messaging must be removed from current electricity bills to free-up space and reduce potential confusion amongst consumers.
- LDCs are in favour of a regulatory "clean-up" to remove outdated items, indicating they have "maxed out" the available space on electricity bills.
- The requirement for LDC's to issue envelopes marked with the "8% Provincial Rebate" will be repealed. In addition, the following requirements should also be repealed by July 1, 2017, to provide LDCs with the necessary space to include new messaging:
    1. Remove 8% provincial rebate messaging (O. Reg. 364/16), while retaining the 8% line item.
    2. Remove Debt Retirement Charge (DRC) messaging, while retaining the DRC line item.
    3. Remove Hydro One's current Rural or Remote Electricity Rate Protection (RRRP) messaging requirements (O. Reg. 442/01), which will no longer be accurate once the program is broadened under OFHP.

On-Bill Items to be Removed

Toronto Hydro-Electric System Limited

YOUR ELECTRICITY BILL

TORONTO HYDRO

Account Number
30[redacted]
To be used for payments

Premise number
4[redacted]

Meter Number
10[redacted]
[redacted]
SCARBOROUGH ON [redacted]

Statement Date	Feb 13 2017
Amount Due	$92.32
Due Date	Mar 05 2017
Amount Paid	

416.542.8000 www.torontohydro.com

Interest will be charged on any amount not received by the due date at the rate of 1.5% compounded monthly (19.56 % per annum) from the due date until receipt of such amount and all accrued interest

Service Location: [redacted], SCARBOROUGH

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Your Electricity Charges

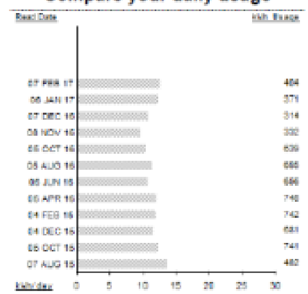
Electricity

****Electricity supplied by Toronto Hydro through Standard Supply Service.
Billing Inquiries: (416) 542-8000

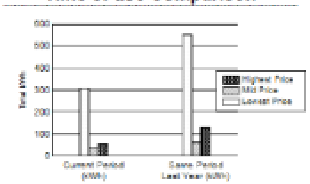
Time of use - Winter

57.113 kWh On-peak (Highest Price) @ $0.18 / kWh	10.28
38.826 kWh Mid-peak (Mid Price) @ $0.132 / kWh	5.13
308.061 kWh Off-peak (Lowest Price) @ $0.087 / kWh	26.80
Delivery	42.59
Regulatory	3.12
Debt Retirement Charge[1]	0.00
Your Total Electricity Charges	87.92
H.S.T. (H.S.T. Registration 896718327RT0001)	11.43
8% Provincial Rebate	7.03 CR
Your Previous Charges	
Amount of last bill	89.59
Payment Received Jan 16 2017 - Thank You	89.59 CR
Balance Forward	0.00
Total Amount Due by Mar 05 2017	**$92.32**

Compare your daily usage



Time of use Comparison



Our Conditions of Service document is changing.
Learn more at torontohydro.com/conditionsofservice

Your electricity usage

Meter Number	Meter Reading Period	Number of Days	Read Type	Current Reading	Previous Reading	Billing Mult.	kWh Used	Loss Factor Adjustment	Adjusted kWh Used
1[redacted]	JAN 06 2017 TO FEB 07 2017	32	Act.	96142	95738	1	404	1.0376	419.189

[1] The Debt Retirement Charge was removed for certain residential consumption after Dec. 31, 2015.
Learn more at Ontario.ca/DRC.
Debt Retirement Charge exemption saved you $2.83

The Ontario government is providing a rebate on your electricity costs equal to the provincial portion of HST.

DRC Messaging O. Reg. 275/04

8% Rebate Messaging O.Reg. 364/16

OFHP On-Bill Messaging

- The Ministry is proposing that standardized messaging appear on all electricity bills as of July 1, 2017 to explain the existence of the OFHP.
- Regulatory amendments would also require the 11 affected LDCs to include a "First Nations Delivery Credit" line item, where applicable.
- LDCs have indicated that including standard OFHP on-bill messaging for July 1, 2017 does not pose a problem, so long as adjustments to the 8% rebate messaging and other existing messaging are made where required.
- The Ministry intends to include the prescribed on-bill message in its May 2017 regulatory posting, which would provide LDCs with enough time to implement the necessary billing system changes.
- The following two options have been developed for consideration as the required on-bill message, subject to Legislative Counsel review:

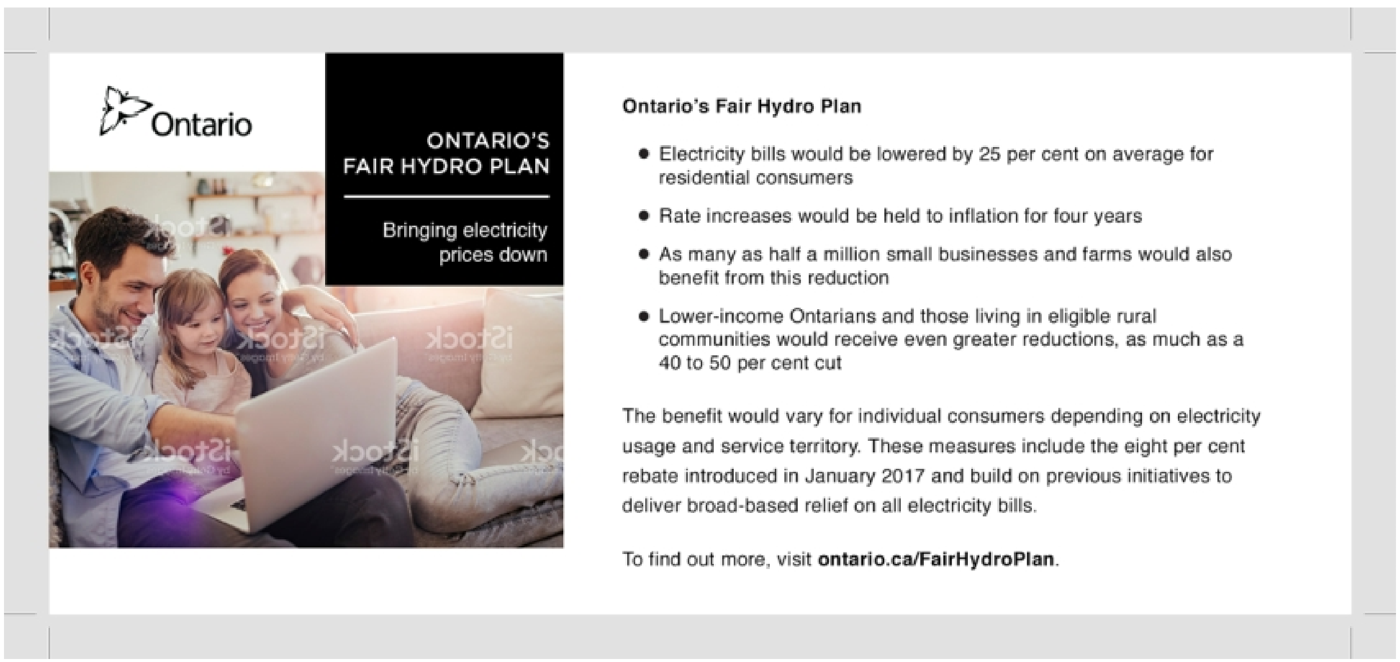
Ontario's Fair Hydro Plan substantially lowers electricity bills for typical residential consumers. This includes the eight per cent rebate introduced in January 2017, and builds on previous initiatives to deliver broad-based relief on all electricity bills.

Ontario's Fair Hydro Plan lowers electricity bills by 25 per cent on average for typical residential consumers. This includes the eight per cent rebate introduced in January 2017, and builds on previous initiatives to deliver broad-based relief on all electricity bills.

- Note, similar to the provisions incorporated under ORECA, the OFHP regulations would allow LDCs to petition the Minister for an exemption to OFHP messaging requirements.

Regulated OFHP Bill Insert

- While some LDCs may begin providing OFHP bill inserts in June, all LDCs will be required by regulation to issue OFHP bill inserts beginning July 1, 2017.
- The regulations will direct LDCs to provide the same OFHP bill insert once every quarter for a period of 12 months (total of four bill inserts per LDC).
- The Ministry will provide LDCs with the messaging, design and translation of the mandatory bill insert, but no printed copies.
- The messaging included on this insert will be subject to Legislative Counsel review, however minimal changes are expected from the voluntary bill insert, which has already been reviewed.


Ontario

ONTARIO'S FAIR HYDRO PLAN

Bringing electricity prices down

Ontario's Fair Hydro Plan

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The benefit would vary for individual consumers depending on electricity usage and service territory. These measures include the eight per cent rebate introduced in January 2017 and build on previous initiatives to deliver broad-based relief on all electricity bills.

To find out more, visit **ontario.ca/FairHydroPlan**.

Post-July 1, 2017

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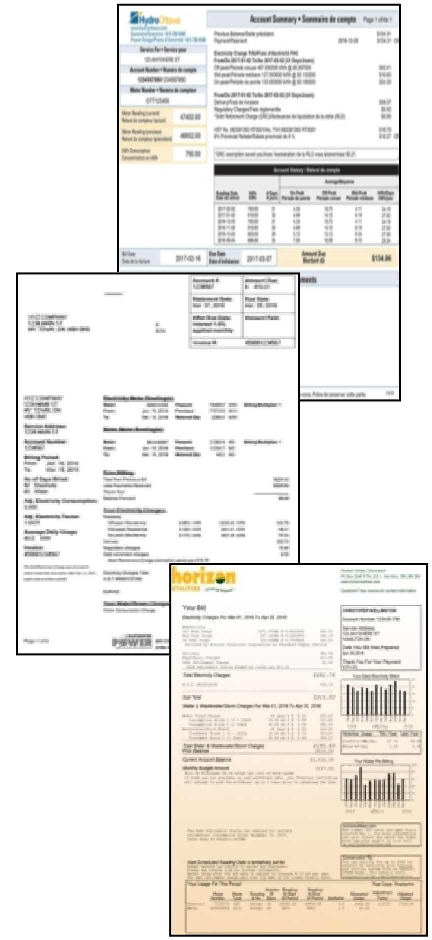
Redesign Action Plan – Long-Term Messaging

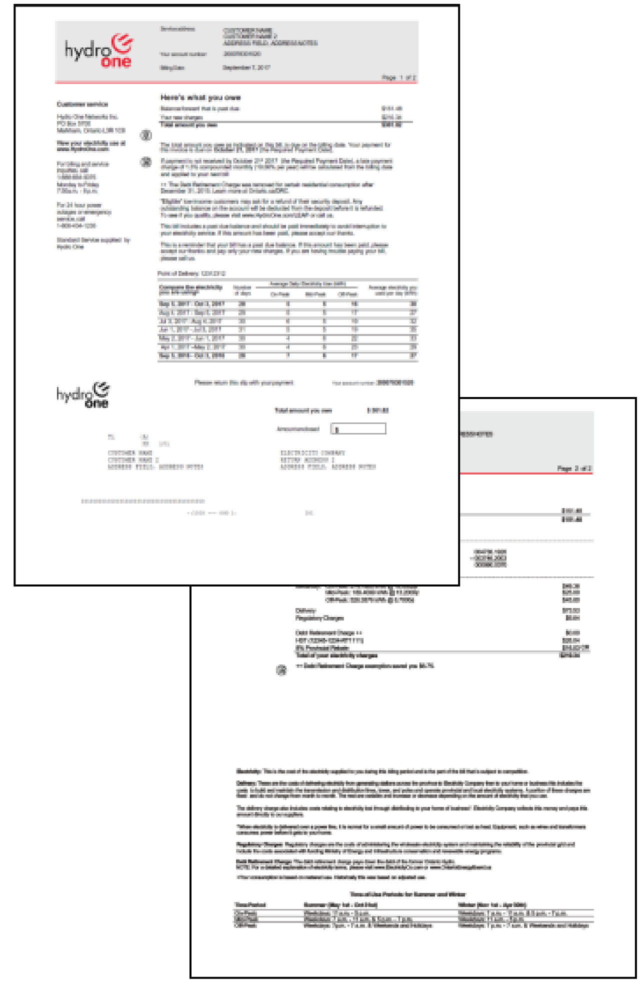
- The Ministry believes there is opportunity for consultation on the design of the bill, with a goal to refresh the regulatory framework to improve the value of the bill to the consumer across all LDCs.
  - Changes of this nature will require more in-depth consultation with LDCs, as well as broader regulatory amendments to simplify the requirements, necessitating a longer period to implement.
  - This refresh would also include opportunities to communicate OFHP savings in a more personalized and comprehensive manner. For example, each customer could receive a “personalized” message indicating how much they saved as a result of the plan.
- The Ministry proposes to convene with LDCs in July, once they’ve had sufficient time to implement the OFHP initiatives and prescribed messaging.
  - We would discuss the changes they would like to see to bill presentment and seek their feedback on how to improve the associated regulations.
  - These consultations will also involve consumers, consumer advocates and other interested parties.
- Based on this feedback, the Ministry would aim to introduce regulatory amendments to simplify bill presentment and introduce dynamic OFHP messaging in the Fall 2017.



Hydro One

Hydro One – Redesigning Electricity Bills

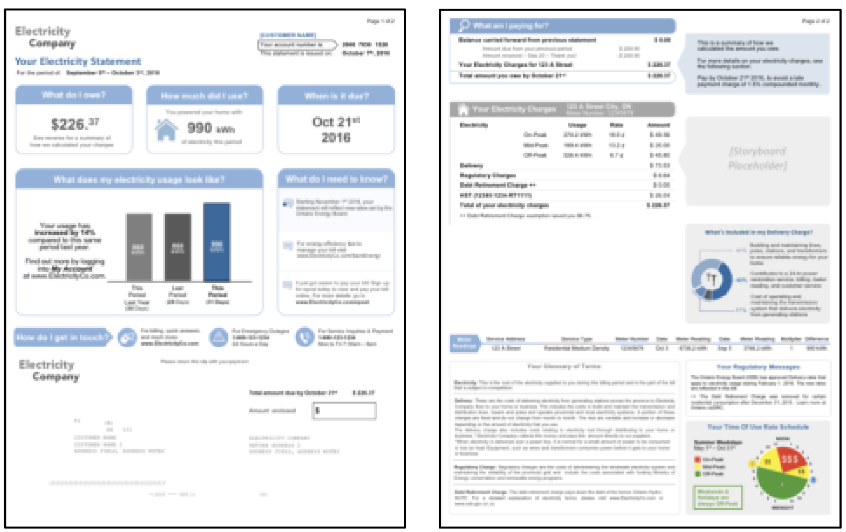
- LDCs often receive feedback that current electricity bills are confusing and do not provide the desired information.
- In recognition of this growing customer service issue, Hydro One has been investigating ways to improve the appearance and comprehension of its bill, which has remained unchanged for over a decade.
- As part of this undertaking, Hydro One has enlisted the services of a behavioural research firm and engaged an online panel of 4,000 customers. They have also held in-person research sessions and consulted with the OEB and the IESO.
- Key feedback from customers indicates that their current bill suffers from: a lack of transparency, over-complicated language, overcrowded text, a lack of visual aids and a formal tone, among other concerns.
- Using this feedback, Hydro One has prototyped alternative bill designs which satisfy the current regulatory requirements, as well as an “ideal” bill which is unconstrained by regulations.
- Hydro One’s redesigned bills have been observed to increase customer satisfaction and comprehension of electricity bills, as well as improve attitudes towards LDCs and the electricity sector.



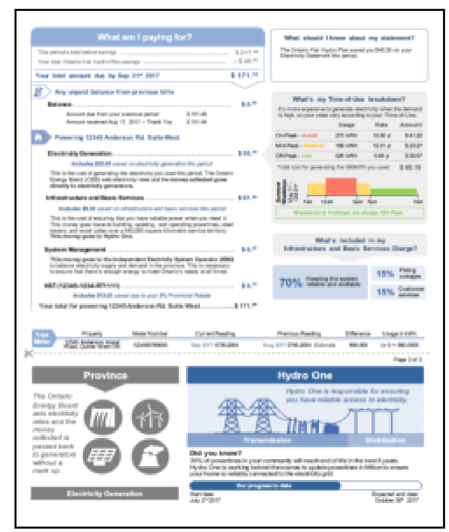
Hydro One: Current Bill

Hydro One – Ideal Redesigned Bill

- With their ideal redesigned bill (see right), Hydro One adopts design changes that are not currently permitted under the O. Regs. 275/04 and 364/16.
- On April 25, 2017, Hydro One provided the Ministry with a proposed set of regulatory amendments which they indicate are necessary to proceed with their ideal bill redesign.
  - The Ministry is not prepared to adjust the regulations to affect all LDCs; such an approach would pre-empt the Redesign Action Plan.
- To enable Hydro One’s ideal bill, the Ministry would need to exempt Hydro One from the relevant regulatory requirements as of July 1, 2017, deferring regulatory reform for the RAP.



Hydro One: Redesigned Bill



Hydro One: Ideal Revised Bill

Hydro One Exemption – Considerations

- A full exemption for Hydro One from the billing regulatory requirements would enable them to undertake reforms that may be of concern to the Ministry from a consistent messaging perspective. Among other things, Hydro One has signalled its intention to do the following:
  - Include dynamic OFHP on-bill messaging as of July 1, 2017 that will indicate how much ($) each customer has saved as a result of OFHP. The ministry is reviewing how the savings are calculated, but may change depending on the work related to bill design (see next slide).
  - Introduce new terminology and descriptions of key charges that appear on consumers bills (see below), while the existing requirements must be maintained by other LDCs. This could lead to consumer confusion, if customers of other LDCs compare bills to those of Hydro One.
- In light of these concerns, the Ministry should consider granting Hydro One the exemption with the condition that they must continue to display the four sub-headings required under O. Reg. 275.05, which consist of “Electricity”, “Delivery”, ”Regulatory charges” and “Debt retirement charge”.
  - Hydro One proposes to replace these sub-headings with the following line items, in order, “Electricity Generation”, “Infrastructure and Basic Services” and “System Management”. They would also remove “Debt retirement charge” as a sub-heading.
  - Maintaining the current terminology would ensure consistency across the province, as well with OFHP initiatives (e.g., the “First Nation *Delivery* Credit”). It would also allow the Ministry to consult with all LDCs on these terms in Fall 2017.
- A decision is also needed on whether Hydro One would comply with the standardized July 1, 2017 OFHP billing requirements (i.e., quarterly bill inserts and on-bill messaging). If so, these requirements must apply outside of Hydro One’s proposed regulatory exemption.
- The Ministry plans to undertake its own review of regulatory billing requirements in Fall 2017, at the same time Hydro One plans to release its redesigned bills.
  - Following Ministry consultation, Hydro One may be required to alter its bills once more, which may cause additional costs and changes to terminology.

Hydro One – OFHP Calculation

- Hydro One has indicated they are keen to provide dynamic OFHP messaging to their customers in order to respond to increasing customer inquiries, as well as to provide better customer service.
- Hydro One has requested LDCs be allowed to include dynamic messaging for July 1, 2017 (i.e., $ savings on a per customer basis), while static on-bill messaging could be required for those LDCs unable to do so.
- The Ministry has informed Hydro One that the calculation of "OFHP savings" (i.e., which programs/savings are attributable to OFHP) has not been finalized and may be subject to change. Hydro One was agreeable to amending their calculation based on future Ministry direction.

Calculation of "OFHP Savings":

- Hydro One **includes**:
  - RPP savings from Global Adjustment Refinancing;
  - The broadened Rural or Remote Rate Protection (RRRP);
  - The First Nations Delivery Credit (FNDC) (as a new line item and in the rolled-up savings); and
  - Regulatory charge reductions.
- Hydro One does **NOT include**:
  - Ontario Electricity Support Program (OESP) enhancements (still a separate line item), and
  - the 8% provincial rebate (still a separate line item).

Your Electricity Charges

Meter Number: 123456789000 Residential Medium Density

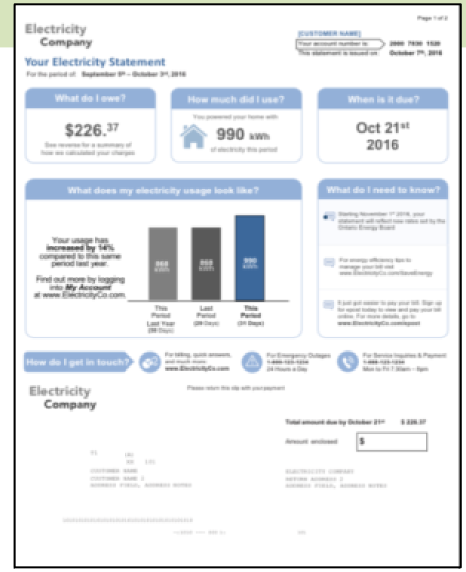
Electricity		Usage	Rate	Amount
	On-Peak	275.0 kWh	14.25 ¢	$ 39.08
	Mid-Peak	189.0 kWh	10.45 ¢	$ 19.79
	Off-Peak	526.0 kWh	6.89 ¢	$ 36.26
Delivery				$ 61.44
Regulatory Charges				$ 6.32
8% Provincial Rebate				- $ 13.03
HST (12345-1234-RT1111)				$ 19.48
Total of your electricity charges++				**$ 169.39**

++ Ontario's Fair Hydro Plan saved you $46.50.

Appendix

Hydro One – Ideal Bill Changes

- In order to achieve their ideal bill, Hydro One would apply the following regulatory changes:
  - removes the heading “Your Electricity Charges”, as well as the four bill subheadings that appear on current invoices
  - includes three new line items: “Electricity Generation”, “Infrastructure and Basic Services” and “System Management”, as well as a plain language description of each term on the face of the bill
  - discards the glossary of terms that appears on the back page of bills
  - removes on-bill messaging and line item requirements related to the DRC (except for those customers who may still incur charges)
  - renames the “8% provincial rebate” line item to “8% rebate”, and removes associated 8% rebate on-bill and envelope messaging
  - provides historical consumption information from the same billing period of the previous year, as well as the immediately previous billing period
  - determines the placement of Minister’s Informational Messaging (e.g., DRC and OESP on-bill messaging), which is currently prescribed by regulation.



O. Reg. 275/04

- O.Reg. 275/04: ‘*Information on Invoice to Low-Volume Consumers of Electricity’* is the main regulation which prescribes specific content and wording which must be included on residential and small business bills for electricity.
- Items mandated by O.Reg. 275/04 include:
  - The inclusion of the heading “Your Electricity Charges”
  - The inclusion of 4 sub headings in the following order “Electricity”, “Delivery”, “Regulatory” and “Debt Retirement Charge” (DRC),
  - Specific requirements related to each of the sub-headings, for example:
    - Electricity: the invoice must indicate clearly and separately the amount of electricity consumed, the commodity price for the electricity and any other information related to the consumption of electricity that may be required as the result of other regulations or OEB requirements
    - Delivery: O.Reg. 275/04 specifies that the bill must indicate the total delivery charge and also lists the various charges which must be included in the calculation of the total delivery charge
    - Regulatory Charges: O.Reg. 275/04 specifies that the bill must indicate the total regulatory charge and also lists the various charges which must be included in the calculation of the total Regulatory charge
    - DRC: if the bill is for a residential consumer after December 31, 2015 then the DRC payable should be listed as zero. Otherwise the invoice must clearly indicate the amount of the debt retirement charge payable
  - The inclusion of:
    - The historical consumption of electricity by the consumer that enables the consumer to compare electricity consumption from the current billing period to electricity consumption from earlier billing periods
    - Consumption information as measured by the meter
    - Messaging related to Conservation, Renewable or Alternative Energy Sources, the DRC exemption and the Ontario Electricity Support Program (OESP) as appropriate. Actual messaging may be prescribed (content, form, location of the message on the bill) by the Minster
    - A glossary explaining the 4 sub-heading items in prescribed language set out in O.Reg. 275/04 (see next slide)
    - Information on how to contact the LDC, including website and telephone number, in prescribed language

O. Reg. 364/16

- O.Reg 364/16: '*Invoicing Requirements*' made under the Ontario Rebate for Electricity Consumers Act, 2016 stipulates a number of requirements for LDCs with respect to displaying the 8% rebate as of January 1 2017 on customers' bills
  - On-bill messaging requirements:
    - Must label the credit as "8% Provincial Rebate"
    - The invoice must set out, in a location where conservation or other utility messages to consumers are usually placed, the following statement: "The Ontario government is providing a rebate on your electricity costs equal to the provincial portion of HST".
  - On-envelope requirements:
    - set out the following statement in an appropriate location on the face of the envelope: "Ontario is helping reduce electricity costs for families, businesses and farms", and
    - include, in a reasonably prominent location on the face of the envelope, in a reasonably prominent font size, the words "8% Provincial Rebate".
  - Bill insert requirements:
    - The Ontario government trillium logo must appear in a reasonably prominent place on the face of the bill insert.
    - The words "8% Provincial Rebate" must appear in a reasonably prominent location on the face of the bill insert.
    - The insert must contain the following wording:
      - ► On January 1, 2017, your electricity costs went down 8%.
      - ► Ontario's government is reducing electricity costs by rebating an amount equal to the provincial portion of the HST on your monthly hydro bill. That's an 8% rebate for Ontario families, and on average will mean $130 more in your pocket each year.
      - ► This is part of Ontario's plan to help people with the costs of everyday living by reducing electricity costs. Across Ontario, about five million residential consumers, farms and small businesses will benefit from this rebate.
      - ► [*Insert Electricity vendor or unit sub-meter provider name*] will implement these savings onto your bill by July 1, 2017. Applicable savings will be retroactive to January 1, 2017.
- These requirements represent a fairly prescriptive approach to program messaging. Without regulatory amendment, these requirements will continue and LDCs will comply

OEB Authority – Codes

- The Ontario Energy Board (OEB), the electricity sector's independent regulator, sets out rules and guidelines in its various Codes that electricity LDCs must abide by as a condition of their licence.
- A number of OEB Codes include high level requirements with respect to customer billing, however these requirements largely relate to policies such as billing accuracy and frequency, as opposed to including specific requirements on how these matters should appear on the bill.
  - **Distribution System Code (DSC):** includes the requirement for disclosure of the date of bill issuance, stipulations related to billing accuracy, monthly billing frequency for non seasonal customers, provisions for a minimum payment period and instructions on how to determine the related timings, guidelines on late payment charges, the hierarchy of application of customer payments to respective charges when payment amounts are insufficient to cover the entire amount payable and rules on arrears management.
  - **Standard Supply Service (SSS) Code:** outlines requirements related to the provision of equalized monthly payment/billing plan options to customers, specifies the form of pricing structure to be charged for electricity commodity for various customer types e.g. spot market versus the OEB's regulated price plan (RPP) i.e. time-of-use (TOU) pricing and requirements for LDCs to notify customers of changes to TOU rates/periods on their website and by means of bill messages or bill inserts. The SSS mandates that bills must comply with applicable legislation, regulations and codes.
  - **Retail Settlement Code (RSC):** prescribes rules for transactions and responsibilities between LDCs and retailers, including specific obligations between LDCs and retailers with respect to 'retailer-consolidated' billing by LDCs for customers with retail contracts.