Summary of Comments from Regulatory Registry

Name	Registry Comments	Ministry Response
Denis Forget, private citizen	**8% Rebate and ICI:** • Concerns that expanded eligibility of ICI will result in shifting of GA costs to Class B customers – which will dilute the impact of the 8% reduction.	• The rate mitigation strategy – including amendments to RRRP, ICI and providing an 8% rebate to roughly 5 million customers - was designed to provide rate relief across multiple customer classes and sizes. • Cost impacts and benefits for all customers was factored into the design of the strategy. • No further adjustments are necessary.
Joel Arthurs, private citizen	**Rural or Remote Electricity Rate Protection:** • Raises concerns that rate reductions provided through RRRP are paid for by increasing the costs to the rest of Ontario electricity consumers and suggests that reduced costs should come in the form of electricity rate of global adjustment reductions. • Raised concerns that Hydro One is planning to remove seasonal rate class and raised concerns that this would increase the number of customers eligible for RRRP and increase the cost pressure on other customers who pay for RRRP.	• RRRP funding mechanism was established in the early 2000s as an appropriate mechanism to offer rate protection to rural and remote customers. Proposed amendments to O. Reg 442/01 increase the total amount of available rate protection, but maintain the same funding mechanism. • Notwithstanding a transition from seasonal rate classes, customers classified as R2 must be full-time residents to be eligible to receive RRRP, as required under 442/02 s. 1 (1). No further adjustments are necessary.
	Incentives Renewables • Suggests that government should offer incentives for lower –priced renewables, but not through FIT or microFIT	• No action required. Outside of scope of proposed amendments.
Electricity Distributors Association	**8% Rebate Eligibility** • Requests that a detailed list of intended/eligible customers be provided to facilitate self-declaration, including confirming eligibility for commercial/industrial	• Eligibility criteria is defined in legislation and is phrased so as to capture a broad spectrum of customer types. Such a list could inadvertently limit the application of the benefit to intended customers.

	facilities that may include residential components. • Requests that eligibility be amended so that customers with demand greater than 50kW but consumption under 250,000kWhs/year no longer be eligible.	No adjustments are necessary.
	Identification of Eligible Customers • Request for the regulation to require eligible residential facilities to self-declare their eligibility. • Establish the Ontario Energy Board has final vetting agent of eligibility disputes. • Absolve LDCs of financial responsibility in the event they mistakenly issue rebates to ineligible customers. • Limit retroactive claims of assistance to two years. • Require sub-meter providers to forward 8% rebate amounts to their customers.	• LDCs are required by legislation to provide the rebate to eligible customers by July 1, 2017. LDCs are expected to work with their customer base to find eligible customers in that timeframe. The Ontario Energy Board is empowered to ensure compliance with the legislation. No further adjustment is required. • As requested, the regulations do limit retroactive claims of assistance to two years and places financial flow-through requirements on sub-meter providers.
	Calculation of the Rebate • Clarify treatment of OESP and HST in the base invoice amount when calculating the rebate	• Regulations make clear that OESP is included in the base invoice amount and HST is calculated on the pre-rebate total. No further adjustments are necessary.
	Bill Presentment • Provide LDCs with flexibility to work within the limitations of their individual billing systems. • Remove on-bill Debt Retirement Charge messaging requirements. • Release messaging requirements by end of November. • Provide a time lag with respect to on-envelope messaging requirements so that envelope stock can be procured. • Provide detailed bill insert design.	• The Regulation would allow LDCs to petition the Minister for exemptions should they not be able to comply with messaging requirements. • Debt Retirement Charge messaging is an important customer communication tool. No amendment required • LDCs would be given until July 1, 2017 to begin complying with on-envelope messaging requirements. • Bill insert messaging would be standardized. While full bill insert design would not be required by regulation, the Ministry would provide LDCs with example artwork to use. No amendment required.

		• Pending Cabinet approval, LDCs would be informed of all requirements by the end of November.
	Rural or Remote Rate Protection • Provide the OEB with the power to review future RRRP adjustments for their impact to ratepayers.	• The OEB would adjust the amount of RRRP support available in line with the average provincial distribution rate increase. The year-to-year ratepayer impact of these adjustments is expected to be negligible. As the RRRP charge is a pass-through to customers, it has no direct bearing on the LDC as a stakeholder. No adjustment is required.
	Eligibility for Multiple Relief Measures • Clearly state in regulations, if intended, that customers are eligible for multiple of the newly announced rate relief measures if they meet the eligibility criteria for each individual program.	• Customers are entitled to all programs for which they are eligible. The new package of rate measures was intended to discretely address different classes of consumers. While some overlap may occur on the margins, large-scale multiple eligibility is not expected. No further adjustment is required.
	Industrial Conservation Initiative (ICI) Expansion: • EDA note that potential Class A electricity consumers who due to their participation in conservation programs have seen peak demand fall below 1MW should still be allowed participate in newly expanded ICI. • EDA want clarification that electricity consumers with several accounts within one location will be eligible for ICI. EDA recommends that the regulation state that all disputes regarding eligibility should be referred to the Ontario Energy Board (OEB) for decision. • As ICI expands EDA notes that OEB may need to review the Class B Global Adjustment (GA) accounting to ensure that electricity consumers entering ICI and exiting ICI participants pay their appropriate share of GA.	• ICI is intended to incent a greater number of Ontario businesses to lower their electricity costs by shifting energy demand away from peak demand periods. • The expanded program would allow all electricity consumers over 1MW to participate in the program. This represents a significant expansion to the program. Allowing consumers that fall below the eligibility threshold to continue to participate relates to the existing regulatory language and could lead to further administrative issues for LDCs that will already face challenges associated with new, smaller ICI participant billing/settlement. • The recommendation to clarify rules around multiple accounts at a single location relates to the existing regulatory language and is outside of the scope of the amendment. The regulation uses the definition of electricity market participant/electricity consumer in

		IESO market rules, over which OEB have purview. • The recommendation around the need to review GA accounting in relation to variance account balances relates to the existing regulatory language and is outside the scope of the amendment. The Ministry will note the concern to the Independent Electricity System Operator (IESO) and OEB.
Toronto Hydro	• Provide additional clarity on types of eligible customers. • Do not include OESP discounts in the calculation of the base invoice amount.	• Eligibility criteria is defined in legislation and is phrased so as to capture a broad spectrum of customer types. LDCs are required by legislation to provide the rebate to eligible customers by July 1, 2017. LDCs are expected work with their customer base to find eligible customers in that timeframe. The Ontario Energy Board is empowered to ensure compliance with the legislation. No further adjustment is required. • The policy intention, as communicated publicly, is to rebate an amount equal to the provincial portion of HST. As OESP reduces the amount of HST charged to consumers, it must be included in the calculation to meet the policy intent. No further adjustment is required.
Ontario Federation of Agriculture	• Expand RRRP to all Hydro One R2 customers • Welcomes the proposed expansion of ICI and note that an expanded ICI will benefit greenhouse operations, but that livestock business tend not to be able to lower electricity demand during peak demand periods.	• RRRP is available to all Hydro One R2 customers. No further adjustment is required. • The Ministry notes the comments regarding the relative ability of certain types of businesses to lower electricity consumption during peak periods. ICI is just one of a number of conservation, demand management and rate mitigation programs currently available in the province.

		• ICI is intended to incent a greater number of Ontario businesses to lower their electricity costs by shifting energy demand away from peak demand periods. • Reducing peak demand would increase the reliability of the power grid, reduce greenhouse gas (GHG) emissions and help defer the need to procure new electricity resources.
Hydro Ottawa	• Sub-metering providers should provide LDCs with confirmation they are providing the rebate to their customers to avoid potentially providing double the rebate. • Clarify how the rebate would work with any potential free overnight electric vehicle charging program as contemplated by the Climate Change Action Plan	• In previous programs like OCEB, double rebating has not emerged as a significant implementation issue that would necessitate additional administrative burdens on LDCs and sub-metering provider. The Ministry would have regulatory authority to collect information on this issue. It is a subject of potential program review in the future, but does not require regulatory adjustment at the current time. • The overnight charging program is still in the design stage and a delivery model has not been identified. In the event on-bill rebate is chosen, the Ministry would clarify how this program interacts with the 8% rebate.
The Ontario Greenhouse Alliance (TOGA)	**Industrial Conservation Initiative (ICI) Expansion:** • TOGA welcomes the proposed expansion of ICI. • Requests that the “mandatory base year” be removed (with a declaration or forecast to be used instead) to allow immediate access to ICI.	• The recommendation to remove the base year relates to the existing regulation language and is outside of the scope of the proposed amendments. • Removing the base year to allow new electricity consumers (i.e., new developments/newly constructed facilities) and could increase administrative complexity/risk of over or under collection of Global Adjustment (GA). • The Ministry notes the recommendation and would

		consider it in the future, should further amendments to the regulation be undertaken.