

**2017 LTEP
OEB Edits Tracker**

Lead Division	Chapter	Page #	OEB Proposed Change	OEB Comment	OEB Importance	Accept /Reject	Proposed Counter Edit
SNAP	1	5	shifts the funding of the Ontario Electricity Support Plan (OESP) and most of the Rural or Remote Rate Protection (RRRP) program from electricity bills to provincial revenues. This will reduce the regulatory charges paid by all Ontario ratepayers;				
SNAP	1	6	Table Y: Amounts of Proposed Monthly Credits of Ontario Electricity Support Program (OESP) by Household Income Level – Energy Intensive	Not sure why this is 'proposed'		N/A	Already addressed in current draft of LTEP.
SNAP	1	7	The First Nations Delivery Credit benefits up to 21,500 residential customers living on reserves. The costs are being funded by provincial revenues.	Could be read as a cap; consider rephrasing			
ESP	1	8	Ontario's Fair Hydro Plan helps consumers by refinancing a portion of the Global Adjustment (GA). The GA pays costs associated with contracted and rate-regulated generation, as well as conservation and demand management programs in Ontario.				
ESP	1	9-10	In addition to these measures, Ontario is looking for new ways to provide electricity rate assistance to mid-sized electricity consumers that are too large to be eligible for the OEB's Regulated Price Plan (RPP) and too small for the ICI program. For example, the Ontario Energy Board (OEB) has identified opportunities to improve the way the GA is charged to these mid-sized consumers, also known as non-RPP Class B consumers. For these consumers, the GA is a fixed monthly charge that is the same regardless of the time that they consume electricity. The OEB and the Ministry of Energy are considering changes to the GA charge; a design under which it varies with the time of use could lower prices for some Class B consumers and encourage more efficient consumption patterns.				
	2	10-11	Improving consumer protection and fortifying the OEB's		**		

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SNAP			regulatory powers over USMPs would ensure that their fees and charges are just and reasonable, and that customers served by these companies receive value for money. It would also give the OEB more insight into how these companies determine their costs and set their rates and how they set up their contractual agreements with developers. The ministry envisions that broader USMP regulation will enable consumers living in condominiums and other multi-unit residential buildings to enjoy similar protections as LDC customers, including consideration for: • clarity about what goes into the prices they are charged; • practices regarding disconnections; and • access to the OEB's processes to resolve issues regarding the quality of service USMPs provide to their customers. The Minister of Energy will request the OEB to make it a priority to complete a review of these issues.	We understand this may have already been edited			
SNAP	2	16	<i>The East-West Tie Line will provide a long-term, reliable supply of electricity to meet the growth in demand and changes to the supply mix in Northwest Ontario.</i> .	This paragraph is of serious concern because it could affect the ability of the Board to adjudicate this matter independently.	***		
	2	17	These costs are then folded into the rates charged to their				

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ESP			customers. Natural gas utilities whose rates are not regulated by the OEB and large facilities that must independently comply with cap and trade will decide on their own how to manage their compliance costs.				
ESP	2	22-23	In addition to OPG's oversight of the Darlington refurbishment, Ontario has its own independent advisor, supported by Infrastructure Ontario, to ensure that it has continued and effective oversight. OPG's expenditures on nuclear refurbishment are also being reviewed by the OEB as part of its rate-setting process.				
ESP	2	23	The Province announced on January 11, 2016 that it had approved OPG's plan to ask the Canadian Nuclear Safety Commission (CNSC) to approve the continued operation of Pickering until 2024.				
SNAP	2	24	The development of the Northwest Bulk transmission project will proceed in phases. Phase One, a line from Thunder Bay to Atikokan, is to come into service as soon as is practical, with development work on the second phase, a line from Atikokan to Dryden, proceeding at the same time. Phase Three, a line from Dryden to the Manitoba border, may be needed after 2035 to enable the better integration of provincial electricity grids.	Same as comment above at p. 16 (This paragraph is of serious concern because it could affect the ability of the Board to adjudicate	***		EWT language has been removed in current draft of LTEP.

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				this matter independentl y.)			
CRED	3	25-26	The Province is working with the Ontario Energy Board (OEB) to give consumers more choice in their electricity price plans. As part of its review of the Regulated Price Plan (RPP), the OEB is using pilot projects to test innovative time-of-use price structures. Consumers better manage their costs with time-of-use pricing by reducing or shifting their consumption to off-peak times when electricity is less expensive to produce. Time-of-use pricing also ensures that consumers pay a price for electricity that reflects its value at peak and off-peak times.				
CRED	3	26	Some of the pricing pilots will be combined with smart technologies, such as smart thermostats, and energy use apps to give customers additional ability to manage their electricity use. The pilots will begin next year and run for at least one calendar year. The results will help guide OEB decisions on potential new price plans that increase customer control while also helping to improve system efficiency. In addition to these pilot programs, the OEB has identified improvements to the way the Global Adjustment (GA) is charged to mid-sized commercial and industrial consumers, otherwise known as non-RPP Class B consumers. For these consumers, the GA is a fixed charge that is the same regardless of the time that they consume electricity. The OEB and the Ministry of Energy are considering changes to the GA charge; a design under which it varies with the time of use could lower prices for all Class B consumers, as well as residential and small business consumers who are on the RPP.				
CRED	3	28	This would give Ontario electricity consumers added opportunities to reduce their electricity bills by offsetting their electricity purchases with clean power generated on-site. Net-metered renewable energy systems can also help				

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			reduce peak demand and delay the need for LDCs to invest in costly upgrades to their networks.				
SNAP	3	29	The unique aspects of energy storage come into conflict with some of the rules governing the electricity system. The Province will propose updates to its regulations, and is directing the IESO and OEB to identify barriers to the cost-effective development of energy storage that provides value to customers and the electricity system.				
SNAP	3	30	Ontario wants to provide LDCs with more options for integrating EVs into their networks at the lowest cost. The OEB will support this goal by being asked to look at how LDCs can facilitate access to technologies such as residential smart chargers, including those that could also provide value to the distribution system, such as deferring system upgrades. These new technologies could also use incentives to give more choices to EV owners. For example, an EV owner could be rewarded for allowing the car to be charged at times when the distribution network is being used less. The customer would work with the LDC to find the right combination of preferences so both parties can benefit from smart charging.	Allocation of costs would depend on a number of factors; it's possible not all customer classes would contribute New pricing and charging plans" Ambiguity of which charge/price intended here (commodity vs delivery) suggests			

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				'incentive' is better			
SNAP	3	31	A modern grid is a digital grid. It harnesses the power of data so that customers and utilities can make the right decisions. For LDCs, it means having the information critical to making their networks run as smoothly as possible. For customers, it means the local network will be ready when you want to buy an electric vehicle, install a battery, put up solar panels or assess the benefits of a new pricing planIt means more tools for you to track your energy usage. It means a more efficient, reliable, and resilient grid. Above all, it means potential savings on your bill.	Distributors already face these expectations, including the forecast of renewable energy facility installations and investing in enabling improvements per legislation. Suggest deletion.			
SNAP	3	33	However, that same study found there were several barriers to modernizing the grid further in Ontario. For example, LDCs are challenged by the diffuse benefits issue. This is when they bear the costs of technologies such energy storage, but other participants get the benefits. Without clear rules for addressing diffused benefits, LDCs are less motivated to explore solutions that may be more cost-effective and provide greater benefits to the grid. Ontario is committed to removing these barriers so that utilities can make the right investments. If there's appetite for a broader rewrite, consider: However, there remain several barriers to modernizing the grid further in Ontario. For example, LDCs and other potential asset owners are challenged by the fact that some novel technologies have widespread benefits that do not always get adequately recognized and compensated. This is sometimes known as the diffused benefits issue. If	Not clear which study This paragraph could benefit from many changes, but the most crucial is the one that appears in the text – change 'prevented from' to 'less motivated to'.			

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			investors bear all the costs of a given project, such as an energy storage installation, while other participants get some of the benefits but bear none of the costs, the business case for an investment is weaker. Without clear rules for addressing this phenomenon, businesses, including LDCs, are less motivated to explore solutions that may be more cost-effective and provide greater benefits to the grid. Ontario is committed to removing these barriers so that utilities and other potential asset owners can make the right investments.				
CRED	3	35	Renewable generation systems, such as solar PV panels, are becoming more widely adopted across the province. When strategically located and combined with smart communications and control systems, renewable distributed generation can benefit LDCs and their customers: utilities can defer or avoid costly investments in their local distribution networks, and customers can generate and store their own power, lowering their own bills and ensuring reliable access to electricity when power from their network is not available. The Province and the IESO will develop a program to support the deployment of strategically located renewable DG systems, paired with other DERs and smart grid technologies, to demonstrate their value to customers and the grid. The data gathered from these innovative projects will help inform the development of the policy framework applicable to renewable DG and steer further cost effective integration of these resources into Ontario's energy system while ensuring value for customers.				
SNAP	3	36-37	To encourage change in the energy sector, the Province will work with utilities and other partners to build a culture of innovation, and will look to the IESO and the OEB to explore, where cost-appropriate: - building a stronger culture of innovation in the sector; - the identification of barriers to energy storage;	Connection between choice and non-wires solutions is not clear. OEB does	***		

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			• utility facilitation of residential smart charging; • the deployment of renewable distributed generation and other distributed energy resources at scales and locations that provide value to customers; • the use of innovative, non-wires solutions that could, among other things, allow utilities to manage their systems more efficiently or cost effectively; • a cost-benefit framework that provides clarity on the treatment of investments which provide benefits to other electricity system participants without a means for recovering commensurate costs from them (also known as the diffuse benefits issue); • ; • the ability of utilities to make non-traditional distribution system investments that would ultimately reduce ratepayers' costs associated with capital or other investments; and	not believe this is an accurate characterization of the legislative provision in question.			
SNAP	3	37	As part of this effort, the Province will encourage LDCs to raise the profile of their plans for how they intend to modernize their grids and their businesses as part of their filings to the OEB.	OEB currently expects this as part of DSP; change to follow directive language.			
SNAP	3	41	• Barriers to the deployment of cost-effective energy storage will be identified, and so will steps for pursuing opportunities to advance the cost-effective modernization of Ontario's electricity sector; • Utilities will be able to intelligently integrate electric vehicles into their grids, including smart charging in homes;	This might sometimes depend on local conditions.			
SNAP	4	42	The independence of the Ontario Energy Board (OEB) is a vital feature of Ontario's electricity sector. It gives consumers and sector partners the confidence that decisions are being made in the public interest. Ontario	We don't see this paragraph as necessary.		N/A	Already addressed in current draft of the LTEP.

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			upholds this independence, and expects that the OEB, when delivering on the vision outlined in <i>Delivering Fairness and Choice</i> , will set policies in a manner that benefits ratepayers and the sector as a whole.				
SNAP	4	43	. By focusing on the principles of transparency, responsiveness to customers, efficiency and cost-effectiveness, the OEB will continue to support a future in which: • utilities (LDCs and transmitters) have incentives to cut costs and make annual improvements to productivity and cost-efficiency; • utilities are constantly striving to improve; • utilities are held to account when expectations are not met; • customers get the highest possible value from their electricity services; and • businesses and other large customers have a timely and predictable process to connect to the grid or modify their existing connections. Ontario will look to the OEB to further strengthen the accountability that both distributors and transmitters need to show to their customers, particularly with respect to reliability.	It is not clear which enhanced requirements are being referred to. Modified another sentence as alternative. Also, the matter of timing is not something that can be prescribed.	***		
SNAP	4	43	Reliability and quality of service are of vital importance to electricity consumers. This is especially true for communities on long, radial lines that can fail more frequently and for businesses that are particularly sensitive to electricity outages or fluctuations. The OEB has considered a number of ways to improve reliability over the years and the Province will look to the OEB to examine further cost-effective steps that could help customers be better aware of the reliability of their service and their ability to resolve their concerns. The Province believes that an enhanced framework for the reliability and quality of service of transmission and	Intended to better distinguish the province's vision and to avoid it being misunderstood as the government directing the OEB in a manner that	***		

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			distribution utilities could provide customers with increased benefits, for example by:	violates the OEBA.			
SNAP	4	44	The Province will direct the OEB to review the standards that transmission and distribution utilities currently have for reliability and quality of service and options for improving the standards. It will also ask the IESO to review how its planning and policies can improve customer reliability.		***		
SNAP	4	44	<i>The publication of standardized and more detailed criteria for reliability would ensure greater transparency for customers. This is particularly relevant for transmitters and large distributors.</i> <i>The current LDC scorecard requires Ontario distributors to report their system-wide reliability. This means a small distributor, like Whitby Hydro with fewer than 40,000 customers, reports the same level of detail as a large distributor like Toronto Hydro with nearly 700,000 customers.</i> <i>The OEB's expectation that transmitters have scorecards was implemented prior to the most recent rate cycle; scorecards for some transmitters are expected to be in place soon. Scorecards may vary, depending on the size of system a transmitter operates. Hydro One, a large transmitter with hundreds of customer delivery points may not report its performance with the same granularity that a small transmitter like Five Nations Energy Inc., with only four delivery points, reports.</i>		**		
SNAP	4	45	The Province will look to the OEB to explore ways of facilitating these partnerships where they make economic sense, as well as additional ways to realize these savings and provide better customer service. The Province will also look to the OEB to identify ways that its own authority could be enhanced to promote regulatory efficiency, and reduce costs .	Rephrased to avoid prescribing method.	***		Language already revised based on OEB staff edits (SNAP take a look and see if we need to revise further).
SNAP	4	47	In the spring of 2017, the OEB issued a draft framework that will define cyber security guidance and reporting				Revised based on OEB staff comments (but this is alternative language, leave to SNAP to decide which

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			requirements for LDCs. This framework will be in place by the end of this year.				is best).
SNAP	4	47	As they exercise their respective responsibilities for planning, the Province will look to the IESO and the OEB to promote a co-ordinated, streamlined and longer-term approach to the end-of-life replacement of transmission and distribution assets. The approach needs to be consistent with the beneficiary pays principle, so that consumers who benefit from the asset are responsible for the costs.				
SNAP	4	49	- The Province continues to entrust the Ontario Energy Board (OEB) with responsibility for improving the performance of local distribution companies (LDCs). - The Province will look to the OEB to identify additional tools and powers that it could use to make utilities more accountable to their consumers, promote efficiencies and cost reductions, encourage partnerships, and ensure regulatory processes are cost-effective and streamlined while also accommodating changing utility business models. - Ontario will work with the OEB and LDCs to redesign the electricity bill to make it more useful for consumers in understanding and managing their energy costs. - The Province will look to the OEB to review the standards for reliability and quality of service for transmitters and distributors and options for improving the standards. It will also ask the Independent Electricity System Operator (IESO) to review how its planning and policies can improve reliability.		***		
N/A	5	51	No edit apparent.				
CRED	5	57	The OEB will also identify steps for pursuing further energy efficiency on the distribution system.	Align with directive			Already addressed in current draft of the LTEP.
CRED	8	81	As part of the mid-term review of the DSM Framework that is currently underway, natural gas utilities are expected to propose a transition plan on how to integrate natural gas conservation into their planning for future infrastructure.				
SNAP	Glossary	88	Beneficiary Pays – an approach to cost allocation where consumers pay for an asset in proportion to the benefits	Check			

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			they derive from it. they benefit from. This protects ratepayers from paying for infrastructure that benefits only a few customers.				
SNAP	Glossary	90	Ontario Energy Board (OEB) – The OEB is the independent agency that regulates Ontario’s electricity and natural gas sectors in the public interest. .				
ESP	Glossary	90	Regulated Price Plan (RPP) – Prices set by the OEB for residential and small business customers in Ontario.				
CRED	Glossary	90	Time-Of-Use Prices – Prices that vary in accordance with the changing value of power at different times of day.				