



Attention:  
Board Secretary, Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27th Floor  
Toronto ON M4P 1E4  
E-mail: boardsec@ontarioenergyboard.ca  
Fax: 416-440-7656

**Re: OEB file number, EB-2019-0234**

Hydro One Networks Inc. 2015 to 2017 Distribution Rates Approval  
Motion to Review part of the Board's decision of March 12, 2015 in Hydro One's 2015-2019 distribution rate application in proceeding EB-2013-0416.

FOCA has reviewed Hydro One's October 1, 2019 submission in this matter, and is in general agreement with, and supports, that submission.

The Federation of Ontario Cottagers' Associations (FOCA) represents the interests of Ontario's 250,000 waterfront property-owning and is supported by our 500+ member associations from across the Province. Ontario's waterfront property owners are represented in every Hydro One rate class but significantly, comprise the bulk of the 154,000 Hydro One Seasonal Rate class customers. As such, we continue to have considerable concern about any reassignment of customers between classes, and the resulting rate upheaval this might entail. By way of further support, we attach herein letters of support from several our largest member groups, notably the Lake of the Woods Stewardship Association, the Georgian Bay Association, and the Lake of Bays Association.

As intervenors in the original rate decision related to eliminating the Seasonal Class (EB 2015-0416) we remain concerned about the intended and unintended consequences of this decision.

With respect to the Hydro One Motion in proceeding EB-2013-0416 FOCA we submit the following comments for your consideration:

**Change in Circumstances Warranting a Review of the 2015 Decision**

When the OEB issued a letter about the implementation of all-fixed charge distribution rates (which was then codified in a September 15 OEB Order) this created a completely different context and implications for the March 2015 Order.

In the March 2015 Decision the Board was voicing concerns that low-volume seasonal customers were not paying the full costs of serving them, and the Board was relying on that fact as grounds to eliminate the Seasonal Class.

The policy decision and September 2015 Order subsequent fully addresses that concern by requiring the move to all-fixed charge residential distribution rates which, when completed, will result in low and high-volume seasonal customers paying the same charge for distribution service. The significance of that decision was, and remains, that both low and high-volume customers will be paying an equal and fair share of their costs, which was the major driver for the elimination of the Seasonal Class.

In considering the March 2015 Decision, neither Hydro One, intervenors, nor the Board could have contemplated the customer impacts resulting from the combined effect of moving to all-fixed rates and the impacts of moving seasonal customers to the year-round residential classes. In fact, as it is now known, but could not have been known during the March 2015 proceeding, the bill impacts relied on by the Board in determining that Hydro One's seasonal rate class should be discontinued are no longer an accurate reflection of what will happen to seasonal customers as a result of eliminating the Seasonal Class.

The move to all-fixed rates largely addresses the concern expressed by the Board regarding the disparity in distribution charges between high and low volume seasonal customers and results in a significant bill reduction for all high-volume seasonal customers.

The incremental impact from eliminating the Seasonal Class would be only a small bill reduction of about \$7 per month for those seasonal customers moving to the R1 residential class but would present a large incremental bill increase of about \$68 per month for those seasonal customers moving to the R2 residential class.

FOCA requests, based on the information now available to the Board as set out in Hydro One's October 1<sup>st</sup> submission, as well as on the evidence in the proceeding that led to the March 2015 Decision, that the Board:

- 1) find that Hydro One has met the threshold required for the Board to proceed to review and revise its March 2015 Decision to eliminate the Seasonal Class;
- 2) find that the March 2015 Decision should be revised so as not to eliminate the Seasonal Class.

Respectfully,



Terry Rees, Executive Director  
On behalf of

Federation of Ontario Cottagers' Associations  
#201 – 159 King Street  
Peterborough, ON K9J 2R8

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December 16, 2019

Attention:  
Board Secretary, Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4

***By email: [boardsec@ontarioenergyboard.ca](mailto:boardsec@ontarioenergyboard.ca)***

Re: OEB file number, EB-2019-0234 Hydro One Networks Inc. 2015 to 2017 Distribution Rates Approval Motion to Review Decision to Eliminate Seasonal Rates PROCEDURAL ORDER NO. 1 Dated: November 28, 2019. Rule 42 motion to review part of the Board's decision of March 12, 2015 in Hydro One's 2015-2019 distribution rate application in proceeding EB-2013-0416

Dear Board Secretary,

We are writing to confirm our support for the intervenor submission from the Federation of Ontario Cottager Associations (FOCA) on the above matter.

The Georgian Bay Association (GBA) is an umbrella organization for 19 community associations along the east and north shores of Georgian Bay, representing around 3,000 families. We have been advocating on behalf of our land-owning members for over 100 years and estimate that we reach around 18,000 residents of the Georgian Bay. Our mandate is to work with our water-based communities and other stakeholders to ensure the careful stewardship of the greater Georgian Bay environment.

Most of the properties of the residents that we represent are water access only, and almost all of these properties are low density, which would therefore be categorized as R2 residential class should the seasonal rate class be cancelled. Accordingly, we request that the seasonal rate class is maintained for the reasons set out by Hydro One and in the submission from FOCA.

Yours sincerely

**Rupert Kindersley**  
**Executive Director**



13 December 2019

Mr. Terry Rees, Executive Director  
Federation of Ontario Cottagers' Associations  
#201 – 159 King Street  
Peterborough ON K9J 2R8  
By email: trees@foca.on.ca

Re: OEB file number, EB-2019-0234

Dear Terry,

The Lake of Bays Association represents 1200 seasonal and permanent families living around or near Lake of Bays which is a two-hour drive north of Toronto, in the District of Muskoka.

The Association has been closely following the Federation of Ontario Cottagers' Association's (FOCA's) lobbying efforts regarding the potential elimination of Hydro One's Seasonal Rate Class. Such a move would increase the annual electricity costs for most of our members by as much as \$1000.

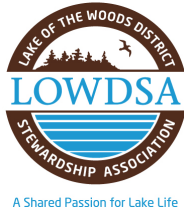
At a meeting yesterday, the Lake of Bays Association Board of Directors voted unanimously to fully support your current efforts to request that the Ontario Energy Board find that Hydro One has met the threshold required for the Board to proceed to review and revise its March 2015 Decision to eliminate the Seasonal Class; and further to find that the March 2015 Decision should be revised so as not to eliminate the Seasonal Class.

We thank you for your efforts on our behalf and encourage you to continue.

Regards,

A handwritten signature in blue ink that reads "Mary Ann Peden". The signature is written in a cursive style and is positioned above the printed name and title.

Mary Ann Peden  
President



## Lake of the Woods District Stewardship Association

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Terry Rees  
Executive Director  
Federation of Ontario Cottagers' Associations (FOCA)  
[trees@foca.on.ca](mailto:trees@foca.on.ca)

December 16, 2019

Dear Terry:

The Lake of the Woods District Stewardship Association (LOWDSA) fully supports the Federation of Ontario Cottagers' Associations (FOCA) submission to OEB ("FOCA Interrogatory Motion EB 2019 0234") in opposition to the elimination of the Seasonal rate class.

On behalf of our more than 2800 member families and as FOCA's largest member association, we appreciate FOCA's efforts as an intervenor at Hydro One Rate appeals at the OEB.

LOWDSA support of FOCA's position in opposition is founded on the following:

- In the March 2015 decision the OEB was addressing concerns that low-volume seasonal customers were not paying the full costs of serving them, and was relying on that fact as grounds to eliminate the Seasonal Class;
- Subsequent to the March 2015 decision, OEB implemented all-fixed distribution rates (codified in a September 15, 2015 OEB Order) which created a completely different context and implications for the March 2015 Order;
- This September 2015 Order, now in effect, will result in low and high-volume seasonal customers paying the same charge for distribution service. This change is being phased in as we speak. The significance of this September 2015 Order is that both low and high-volume customers will be paying an equal and fair share of their costs (which was the major driver for the elimination of the Seasonal Class);
- In considering the March 2015 decision, neither Hydro One, intervenors, nor the OEB contemplated the customer impacts resulting from the combined effect of moving to all-fixed rates and eliminating the Seasonal Class;

In conclusion, LOWDSA echoes the requests put forward in FOCA's submission, specifically that based on the information in the Motion, as well as on the evidence in the proceeding that led to the March 2015 Decision, the Board:

- 1) find that Hydro One has met the threshold required for the Board to proceed to review and revise its March 2015 Decision to eliminate the Seasonal Class;
- 2) find that the March 2015 Decision should be revised so as not to eliminate the Seasonal Class.

Respectfully,

Hardy Bock, President

Diane Schwartz-Williams, Executive Director

c.c. Honourable Greg Rickford, Minister of Energy, Northern Development and Mines/Minister of Indigenous Affairs [greg.rickford@pc.ola.org](mailto:greg.rickford@pc.ola.org)

*The Lake of the Woods District Stewardship Association (LOWDSA) is a vibrant membership-driven organization focused on the sustainability of lake life in our region for over 57 years. It is a not-for-profit association with more than 2,800 individual and family memberships representing cottagers, waterfront property owners, year-round residents, seasonal vacationers and concerned citizens. LOWDSA's members include singles, couples and extended family groups living in the Lake of the Woods watershed area, both in municipal and unincorporated areas, extending from Morson at the south end of Lake of the Woods to the Minaki area on the Winnipeg River and from the Manitoba border east to the Longbow Lake/Dogtooth Lake area (covering an area of approximately 5,500 square kilometers).*