

Ontario AgriCentre

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3 Tel: (519) 821-8883 • Fax: (519) 821-8810 • www.ofa.on.ca

June 9, 2017

Hon. Glenn Thibeault Minister of Energy Hearst Block 4th Floor, 900 Bay Street Toronto, ON M7A 2E1

Minister Thibeault,

Re: 17-ENE003 Proposed regulatory amendment and new regulations for Electricity invoicing to implement changes introduced by Ontario Fair Hydro Plan Act, 2017 (OFHPA)

Please consider the below comments related to 17-ENE-003 from the Ontario Federation of Agriculture (OFA). The OFA is the largest voluntary, general farm organization in Canada, representing over 36,000 farm families across Ontario. As a dynamic farmer-led organization based in Guelph, Ontario, OFA works to represent and champion the interests of Ontario farmers through government relations, farm policy recommendations, lobby efforts, community representation, media relations and more. OFA is the leading advocate and voice for Ontario farmers.

The proposed amendments are necessary to inform customers about bill impacts related to OFHPA initiatives and to update billing line items to reflect new, amended and outdated initiatives. However, considering that there are nearly five million residential and small business electricity customer accounts in Ontario, the requirement to include four quarterly inserts with customer bills between July 2017 and July 2018 seems to be excessive and an unjustifiable expense. One insert should be sufficient to explain these proposed changes and would save millions of dollars in administration costs.

When considering the sheer number of monthly paper copy utility bills mailed out to Ontario electricity customers each year, OFA recommends that Ontario customers be encouraged to elect to receive only electronic bills. Administration cost savings could be used to further support energy poverty or be directed towards financing the initiatives under 17-ENE003.

Taken to the next logical step, moving to a two-month residential and small business customer billing period would save \$350 million annually in billing costs which could also support energy poverty programs, or help reduce Global Adjustment by directly reducing administration costs.



Thank you for considering these comments.

Sincerely,

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Keith Currie President

cc: Ontario's Regulatory Registry online comment email OFA Board of Directors