

November 7, 2022

Nancy Marconi, Registrar
Ontario Energy Board
2300 Yonge St,
Toronto, ON
M4P 1E4

VIA OEB Online Filing Portal

Dear Nancy Marconi,

Re: EB-2022-0160 - Proposal to amend the Standard Supply Service Code and the Regulated Price Plan Manual

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations, to ensure the agri-food sector and rural communities are included, consulted, and considered in legislation that impacts the sustainability and growth of Ontario farm businesses.

Ontario's agri-food sector represents a broad range of innovative energy suppliers and energy consumers throughout the province. We are pleased to present comments on the Ultra-low Overnight Electricity (ULOE) plan, from the perspective of the agricultural sector and Ontario's rural farming communities.

The Standard Supply Service Code allows Ontario's Customer Choice initiative, and Regulated Price Plans (RPP) consumers with smart meters may now switch between standard Time-Of-Use (TOU) pricing to tiered pricing. OFA supports the Ministry of Energy and OEB efforts to broaden RPP consumer choice by adding the ULOE plan option.

OFA supports OEB requiring distributors to implement price plan switches and inform customers when price plan elections will take place within service standard timelines, including timely notice of any incomplete change and reasons for such failures.

Considering that only 4% of customers switched price plans more than once, OFA supports the OEB decision to avoid limiting the frequency of switching for consumers who, for whatever reason, want a different price plan.

Many Ontario farmers have switched between Tiered and TOU plans to better reflect their usage in a preferred billing plan. It is important to address those consumers in rural areas that still do not have access to reliable broadband infrastructure which limits their ability to switch to the TOU price plan or the new ULOE plan.

The expansion of broadband infrastructure and reliable internet service is a priority for Ontario farmers. OFA supports efforts to increase the rate of broadband expansion in Ontario, especially to significantly underserved rural areas, and we encourage the OEB to remove barriers that slow development and delay deployment.

OFA has advocated for Ontario governments to allow Ontario businesses to change their electricity demand profile to access overnight baseline surpluses at a deep discount, thereby avoiding the need to sell surplus overnight electricity below cost to neighbouring jurisdictions.

We also encourage the OEB to consider Ontario's businesses that are on demand billing, yet not large enough to participate in the Industrial Conservation Initiative, nor large enough to commit the capital needed for innovative conservation and demand management (CDM). Ontario farmers are innovators, however, without CDM options, these operations cannot curtail demand and still continue to safely operate livestock facilities and perishable crop storage reliant on HVAC, regardless of seasonal demand peaks in urban centres.

Access to a steep rate reduction for many of these mid-sized operations could contribute significant results to Ontario's objective of shifting demand to periods of surplus baseline nuclear generation and unused intermittent renewable energy that is still under contract with the IESO.

OFA is hopeful that the OEB continues to engage with farm stakeholders, ensuring agricultural and agri-food businesses continue to sustain Ontario into the future.

Sincerely,



Peggy Brekveld
President

cc OFA Board of Directors