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December 16, 2021

Ministry of Energy
77 Grenville St., 6th Floor
Toronto, ON M7A 2C1

Dear Ms. Sarah Heiman,

RE: ERO 019-4554 (Supporting Residential Roof-top Solar and other renewable resources by clarifying eligibility of third-party leasing and financing net meter agreements)

Hydro One Limited is Ontario's largest electricity transmission and distribution provider with approximately \$30.3 billion in assets. Our team of approximately 8,700 skilled and dedicated employees proudly build and maintain a safe and reliable electricity system, which is essential to supporting strong and successful communities. Through our local distribution business, we directly serve 1.4 million residential and business customers. Our mission is to energize life for people and communities, and that includes working to advocate for our customers and help them make informed decisions.

We appreciate the opportunity to provide a response to this proposed regulatory amendment. At present, eligibility requirements have restricted enrollment to those with sufficient up-front capital to pay for the entirety of a roof-top solar installation. Hydro One is supportive of this proposal, which would provide clarity on the eligibility of a customer, who is leasing or financing electricity generations assets, to participate in net metering, as was described in the OEB Staff bulletin issued on October 25, 2021. These proposed changes may improve accessibility for households and businesses to participate in net metering arrangements. This would also remove financial barriers for customers to be part of the net metering program, which is a critical path to energy transformation.

Consumer Protection

Protecting our customers is of paramount concern. Recent experience with the microFIT program raised significant consumer education and protection challenges between the account holder (consumer) and third parties. The introduction of third party financing of net metering infrastructure could result in similar confusion and challenges for customers. As such, we recommend the government ensure the regulatory landscape for third-party financed net metering includes robust consumer protection measures.

Settlement Process

Regulatory amendments should also maintain the current settlement process between LDCs and the customer. This will protect the customer and ensure the settlement process is not complicated by commercial agreements between the customer and third parties.

Conclusion

Thank you very much for the opportunity to comment on the proposed regulatory amendments. Hydro One is focused on our mission of energizing life in a safe, reliable and affordable manner across Ontario and putting customers first. This includes ensuring customers are protected and offered choices. We look forward to continuing work with the Ministry of Energy and across the sector to reach these goals.

Regards,

A handwritten signature in black ink, appearing to read "Dan Levitan". The signature is fluid and cursive, with a large initial "D" and "L".

Daniel Levitan

Vice President Stakeholder Relations, Hydro One Networks Inc.