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March 3, 2023

Ministry of Energy
77 Grenville Street
7th Floor
Toronto, Ontario
M7A 2C1

Submitted via Environmental Registry Comments

Re: Collection, management and improved utilization of smart metering data for behind-the-meter distributed energy resources (ERO Number 019-6521)

Toronto Hydro-Electric System Limited (“Toronto Hydro”) is the local electricity distribution company for the City of Toronto. It has over 780,000 customers and delivers about 18% of the electricity consumed in Ontario. Toronto Hydro is among the utilities that have been able to offer its net metered customers the option to be billed on their choice of pricing plan. Toronto Hydro expects this availability of choice to be extended to cover Ultra Low Overnight Time-of-Use (“ULO TOU”) rates, once these are implemented later this year.

On January 17, 2023, the Government of Ontario posted a policy proposal for stakeholder feedback to amend O. Reg. 393/07, to enable the Independent Electricity System Operator’s (“IESO”) Smart Metering Entity (“SME”) to collect, process, manage and improve utilization of bi-directional smart metering data through the province’s Meter Data Management/Repository (“MDM/R”). The proposal was issued in parallel with an Ontario Energy Board (“OEB”) bulletin that sets out OEB Staff’s view that electricity distributors must charge customers on the Regulated Price Plan (“RPP”) based on the customer’s choice of pricing plans, even if the customer is net metered. Read in conjunction, the proposed amendments to O.Reg 393/07 would allow the SME to process data that would assist utilities not currently compliant with the OEB Bulletin regarding net metered billing to become compliant by way of channeling their consumption billing data through the SME and MDM/R.

As Toronto Hydro is currently able to offer TOU pricing to its net metered customers, it cautions that the wording of the proposal, by way of the “exclusive authority” provision, would ultimately require all utilities to act on this proposal regardless of their current compliance status. Compliant utilities would become prospectively non-compliant unless they undertook further integration with the MDM/R. It is within Toronto Hydro’s capacity to do so if required. However, the process is a costly and time-intensive exercise for internal teams already fully engaged preparing for the implementation of ULO TOU, Green Button, and other business-critical metering and billing projects. Toronto Hydro would propose that the

integration of generation data with the MDM/R should be offered to utilities, but not required of them, at least at the present time.

Should the proposal move ahead, Toronto Hydro respectfully requests that the requirement for compliant utilities to align its systems with the MDM/R should be independent of the OEB's deadlines for compliance with the net metering billing requirement, and completed at a deferred date, in consultation with utilities, to allow for a well-thought out, paced, and cost-efficient implementation process.

All of which is respectfully submitted.

Sincerely,

A handwritten signature in black ink, appearing to read "Kaleb Ruch", with a horizontal line underneath the name.

Kaleb Ruch

Director, Energy Policy and Government Relations (Secondment)
Toronto Hydro-Electric System Limited

KR/jl