



Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St., Suite 2700
Toronto, ON, M4P 1E4

via Delivery

Dear Ms. Walli:

**RE: Draft Report of the Board: Electricity and Natural Gas Distributors' Residential Customer Billing Practices and Performance
Board File No.: EB-2014-0189**

On September 18, 2014, the Ontario Energy Board ("Board" or "OEB") posted a Draft Report of the Board on Electricity and Natural Gas Distributors' Residential Customer Billing Practices and Performance (EB- 2014-0198).

This is the submission from Screaming Power. This submission has been filed and paper / electronic copies have been delivered to the Board.

General Comments:

Screaming Power is appreciative of opportunity afforded by the Board to engage in a constructive, meaningful consultation on matters of Board policy. This is the first time Screaming Power has submitted comments to the Board and we appreciate the opportunity to be heard. We are a small organization, yet our Senior Management have extensive experience in this area of the industry and we are pleased to provide our input on these matters.

Although the Board and the industry has good intentions to assist the market in modernizing business practices, we feel the board should support more global changes that will truly affect Ontario's energy industry overall, rather than focus on billing itself. The issues in the market today have much to do with the inability for consumers of all types to readily receive, analyze and share billing information. In fact, timely delivery of electronic data (billing data, etc.) will allow everyone, including the utilities, to save money and assist in managing billing accuracy and timeliness. It will also enable the energy community to provide innovative applications to their customers revolutionizing the customer experience. The focus need not just be on billing accuracy. The OEB should focus on advising and directing the market on solving the issues through the use of "enabling" technologies, such as standardizing the delivery of billing data in barcodes and utilizing mobile technology. This direction will allow the industry to evolve quicker, innovate the marketplace and permit others to assist utilities in becoming more "customer friendly".



The customer requires quicker access to their detailed bill information, not just an increased delivery frequency of the same information using old technologies. Customers interested in energy usage and conservation are paying late charges and IT fees to acquire the billing data, including sending it out of country to be manually processed. Many others have no desire to automate the collection of energy information, as they have no idea how to do it or what to do with it. If we provide an avenue for the electronic delivery of information, then others (including third parties) have the opportunities to innovate, not just the utility itself.

We feel the OEB needs to look at changing the regulations, policies and guidelines in a manner that “enables” the end user full electronic access to their billing data. We live in the day and age of mobility and the government should create a market environment to promote technology itself to “self-heal” and become part of the solution. Setting requirements without considering the technical effects on Utilities will increase the costs in the short term, but not create a real value for society where others can assist. The Government’s request not only adds cost to the Utility, but it also doesn’t resolve the issue that the industry is still using outdated customer engagement technologies to solve today’s problems.

For example, in Ontario, the energy industry is still focused on managing customer engagement through paper and web sites. To this day, Utilities are building, redefining or creating customer engagement through internet websites. In many cases, Utilities have found dismal (single digit) uptake on website interaction and the technologies used are not customer friendly for today’s mobile community. This is because technology has moved to mobility as a way to access information, deliver content and interact with the end user (one-to-one and one-to-many).

The review of electricity and natural gas distributors’ residential customer billing practices and performance with a focus on ensuring that consumers have timely and accurate billing to assist them in gaining a better understanding their energy use and controlling their costs is needed. But it should be resolved by “enabling” the energy marketplace to revolutionize the customer service experience.

The key issue for this and any other policy is the customer’s access to their data. We tend to forget that the energy industry does not work in a silo, as energy is a key component of our society and mostly everything revolves around it. So why are we still looking at resolving issues utilizing old practices, rather than assisting in true change utilizing technology that now exists.

The Board in looking for feedback on:

The draft Report stated the Board’s intention is for all electricity distributors to transition to monthly billing by January 1, 2016 to help better inform consumers about their energy use and allow them to adjust consumption and control their costs

The Board’s expectation is that all customers receive bills with actual consumption data, with limited exceptions. The Board, therefore, intends to develop an estimated billing policy for electricity distributors.

Bill Accuracy



In its letter of July 17, 2014, the Board accepted the working group's recommendations for the billing accuracy measure and stated that it would amend the DSC to include a billing accuracy measure and target for licensed electricity distributors and the Board will make those amendments as part of this process. The Board is proposing to add section 7.11 to the DSC to include the billing accuracy measure. The target level for the performance measure will be 98%, as stated in the Board's July 17, 2014 letter. The Board will also add a definition for "accurate bill" into section 7.1 of the DSC.

Bill Frequency

Based on the comments received, the Board has decided to extend the timeline for the transition to mandatory monthly billing for all electricity distributors for non-seasonal residential customers to December 31, 2016.

- The Board believes that this is the most effective way to ensure that customers have timely information to gain a better understanding of their electricity consumption so that they can better manage their electricity usage and control their costs.

Estimated Billing

The Board's expectation is that all customers receive bills based on actual consumption data, with limited exceptions.

Anticipated Costs and Benefits

Distributor policies regarding matters such as billing frequency and estimated billing can have a significant impact on customers. The Board therefore sees merit in establishing a standard level of service for all distributors. The Board notes that 19 distributors bill residential customers on a bi-monthly basis. The Board acknowledges that with the transition to monthly billing, there is the potential for incremental costs to be incurred by distributors, due to bill production and mailing, as well as possible system or processes changes. The Board expects that these costs may be mitigated by improved cash flow for distributors as a result of monthly billing, efforts to expand the use of e-billing and potential reductions to customer arrears that can lead to reduction in collection costs and bad debts.

Monthly billing will also provide an opportunity for distributors to have more frequent communication with their customers. Sending a bill on a monthly basis may improve customer relations by reducing inquiries or complaints related to high bills, since the total bill amount will be for one month rather than two.

Monthly billing can also allow customers to more effectively respond to the drivers that increase their energy costs and allow them to better anticipate and manage payments and respond to pricing signals.



Regarding estimated billing and billing accuracy, the Board notes that a large majority of distributors currently estimate bills only in very limited circumstances and would be able to meet the estimated billing rule and the billing accuracy target without incurring material additional costs.

The Board is of the view that accurate bills based on actual metered data can help encourage energy literacy and make it easier for customers to identify the drivers that influence energy use to enable more immediate action to adjust their use and reduce their electricity bills.

Our Commits and Recommendations:

We feel the Board needs to focus on resolving the underlying issue that electronic billing data is not readily available and that sending PDFs of bills is not as effective as sending customers their actual digital billing data (that can be quickly reused). We believe there are very cost effective opportunities to not only guide the market to resolve the consumers' concerns, but also bring the utilities quickly into the information sharing society.

To have the utilities focus their effort on changing their legacy systems from bi-monthly to monthly doesn't resolve the issue on how the data is delivered, or how costly it will be for the Utility to deliver. At this time, customers are required to manage adhoc and expensive processes to access their energy data electronically, yet the customer should be focused on energy conservation and education in a simple, insightful enabling way.

We believe the Electric and Natural Gas community requires change and that the introduction of barcode and mobility technology can quickly and easily resolve many barriers the market has today. We also believe the change can be done with a low implementation cost for all, as the mobile industry has standards in place that can greatly help our energy community. A new customer engagement and customer service paradigm is available utilizing technology that already exists and is being effectively used in other industries.

Thank You.

Gary Michor

CEO

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