



October 21st, 2015

**VIA EMAIL**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli,

**Re: Board File Number: EB-2015-0268  
Proposed Amendments to the Electricity Retailer Code of Conduct, the Code of Conduct for Gas Marketers, the Retail Settlement Code, and the Gas Distribution Access Rule**

In response to the OEB's Notice of Proposal in the above noted matter, CEPC submits the following comments in support of the company's grave concerns regarding some of the proposed new provisions

*1. Plain Language Contracts & 3. Consumer "tip sheet"*

While CEPC is a strong supporter and advocate of consumer protection, education, and understanding, the company has grave concerns regarding the implementation of a standardized contract, cover sheet, and tip sheet. The greatest hurdle CEPC faces with respects to consumer relations, is the constant need to differentiate our brand and core values, from that of other energy retail suppliers that consumers have previously had negative experiences with. In CEPC's experience in dealing with low-volume consumers first-hand, it is apparent that the laws governing the energy sector already make it difficult enough for consumers to differentiate between retail energy providers. CEPC is highly concerned that the use of a standardized cover sheet/contract will have an even greater effect in obscuring the distinction between different energy suppliers. This could have an extremely negative impact on the suppliers that work tirelessly to ensure they have absolutely zero consumer complaints.

*4. Written notice to consumers of the switch to a supplier*

Based on the language previously utilized by the OEB in standardized forms relating to the supply of energy by retail energy providers, CEPC has immense concern that a separate written notice to consumers from their utility will mislead and misguide a great deal of low-volume consumers into believing that they have done something wrong by changing their supply to an alternative deregulated energy provider, and exercising their right to choice of energy suppliers. In support of the justification for the immediate need of this new provision, the OEB has stated in their Notice of Proposal that that they understand that distributor consolidated billing is pervasive in both the gas and electricity sectors, but that this may not always be the case. CEPC does not believe that there are any grounds to substantiate this claim, or the immediate need to implement such a provision. Distributor Consolidated Billing has, and continues to be utilized with relative exclusivity by retailers and marketers for low-volume consumers in Ontario.

Furthermore, it is well-known that many consumers react with instantaneous fear or trepidation when presented with written correspondence from their local gas or electricity distributor that is separate from their monthly gas or electricity bill. CEPC contends that the implementation of this provision could very well defeat its purpose by ultimately leading to increased confusion and misunderstanding amongst low-volume consumers. As a fairly new market participant, CEPC's success is dependent on new customer acquisitions, more so than that of other established suppliers also affected by this provision. As a result, CEPC stands to be more negatively affected by the potential confusion this new provision could cause amongst low-volume consumers.

CEPC wishes to thank the OEB for the opportunity to voice these concerns.

Yours truly,

A handwritten signature in black ink, appearing to read 'Mark Cunningham', written in a cursive style.

*Mr. Mark Cunningham  
President and Chairman,  
Director of Compliance and Regulatory Affairs*