

November 16<sup>th</sup> 2015

Sent by courier to:

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O.Box 2319  
2300 Yonge Street, Suite 2700  
Toronto, Ontario M4P 1E4

Dear Ms. Walli,

**Re: Written Comments, EB-2015-0268**

Attached to this letter, we kindly submit 3 paper copies of Canadian RiteRate Energy Corporation's (RiteRate's) written comments in response to the Ontario Energy Board's (OEB's) Letter dated October 30<sup>th</sup> 2015 Giving Effect to the OEB's Report on the Effectiveness of the Energy Consumer Protection Act, 2010 (EB-2015-0268).

For further information, please contact me at the information provided below.

Sincerely,



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## **Introduction:**

In response to the Ontario Energy Board (Board) letter dated October 30, 2015, Canadian RiteRate Energy (RiteRate) is pleased to make the following submission.

Thank- you for providing the opportunity to comment on the proposed revisions to the Disclosure Statement, Price Comparison and Verification Call Scripts that suppliers use, in addition to the newly proposed Contract Cover Sheet and Tip Sheet.

As indicated by the Board, the purpose of the amendments is to address certain findings in implementing certain recommendations set out in the OEB's report to the Minister of Energy on June 1<sup>st</sup> 2015. One of the findings from the Board and recommendations outlined in this report were to "make retail contracts, disclosures and scripts more consumer friendly" and that the intention of the Board is to "ensure that consumer-facing materials are reader-friendly, simple and as short as possible".

Based on the letter dated October 30<sup>th</sup> 2015 and the Report to the Ministry, we use these principles in forming our commentary as follows:

### **Disclosure Statements:**

We support the inclusion of a dual fuel Disclosure Statement. However, we find that there is not enough information and time to provide adequate commentary. In order to provide detailed commentary on the updates, it would be useful to have a document that outlines the changes in the layout intended, along with an editable document that we can provide electronic comments on. We look forward to solicitation of comments in the coming weeks.

We would like to suggest that the Board consider combining information from the Disclosure Statement along with information from the Consumer Cover Sheet in line with the goal of simplifying consumer facing materials. This would avoid the issue of desensitizing the customer with an inundation of regulated documents.

### **Price Comparisons:**

The updates to the Price Comparisons have been redeveloped to include a side-by-side comparison and identifies the issue of changing consumption. To enhance transparency further for natural gas, RiteRate suggests additionally including a bolded and visible statement indicating that the "The Price Comparison compares current rates from Enbridge, which change quarterly – a true comparison is not possible as future rates are not forecasted".

In the document, there is a reference indicating that rates change every four months. We believe this to be a typo – and suggest correcting this to every three months. Finally, we would like to request consistency in the reference to "natural gas" as opposed to simply "gas".

For electricity price comparisons, we suggest rewording the phrase "the prices can change every May and November" to "the price changes every May and November" as we believe this correction to be more factual. Furthermore, the comment about Global Adjustment currently could be interpreted as the

retailer causes the payment of the Global Adjustment so we would suggest changing the sentence to read “If you switch to a retailer, you will **still** have to pay you share of the GA”.

**Verification Call Scripts:**

The intent of Bill 112 as indicated by the Ministry of Energy is not to wipe out the consumer retail/marketer segment, but rather is to enhance consumer protection. We feel that the requirement for verification in and of itself will wipe out our business.

While we are not supportive of Call Scripts, in our view, the proposed Call Script is still long and takes on a tele-market approach. In the interest of simplifying the call into a script that is more consumer friendly and shorter, we suggest a different approach whereby questions are not asked, but rather a single paragraph statement is made, summarizing all information, which the consumers then accepts or rejects. The approach of the current script unintentionally solicits conversations and questions which may veer too far from the script to pass verification.

**Contract Cover Sheet:**

The Cover Sheet provides useful information to the consumer, however we believe that the appropriate place for this information is in the Disclosure Document, and not in the creation of an additional document. Furthermore, the Cover Sheet, if placed at the top of each contract, unfairly dilutes the branding efforts invested in by marketers/retailers.

Finally, RiteRate would like to request additional information and clarity as to how the Cover Sheet would work over different sales channels such as in person marketing versus internet transactions.

**Consumer Tip Sheet:**

RiteRate has no comments on the Tip Sheet.