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**via RESS and courier**

June 22, 2016

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

**Re: EB-2015-0363: Consultation to Develop a Regulatory Framework for Natural Gas Distributors' Cap and Trade Compliance Plans: Staff Discussion Paper**

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Shell Energy North America (Canada) Inc. ("Shell Energy") submits these comments regarding the Staff Discussion Paper dated May 25, 2016.

#### Rate Design and Bill Presentment

Shell Energy appreciates Staff recognizing the importance of transparency and the recommendation that costs be tracked and reported separately and clearly. However, the approach of creating a rate in a tariff sheet that does not make its way onto the invoice issued to customers is unusual. It also leaves customers in a position of needing to make their own computations in backing the value of this charge out from the delivery charge it is buried within. Shell Energy recommends and requests that in addition to the development of specific rates for inclusion on utility tariff sheets, the costs should be computed and shown separately and clearly on the customer bill.

#### Re-calibration and True Up Processes

While the process discussed by Staff appears generally reasonable, Shell Energy would like to emphasize as imperative that any changes to costs and clearance of deferral accounts must be done on a prospective basis. Any variances must be included in, or rolled forward, for computing and establishing the new rates for future periods. There cannot be any "one-time" adjustments or true ups representing past variances and customer activity.

All of which is respectfully submitted,

*original signed*

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