



August 19, 2016

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2319
Toronto, Ontario
M4P 1E4

Dear Ms. Walli

RE: EB-2016-0179 – Notice of Proposal to Amend Codes and Rules

Local Authority Services (LAS) offers comments related to Proposed Amendments to the Distribution System Code, the Unit Sub-Metering Code, the Electricity Retailer Code of Conduct, the Code of Conduct for Gas Marketers and the Gas Distribution Access Rule.

Thank you for the opportunity to provide comment. LAS' comments specifically focus on the proposed amendments to Electricity Retailer Code of Conduct, which are:

- Attachment C, point 2 recommends replacing Section 7.2 of the Electricity Retailer Code of Conduct by deleting the last sentence of that section and replacing it with the proposed new sentence. It is suggested the first clause of the last sentence be retained ". . .If the complaint is not resolved to the satisfaction of the low volume consumer, . . ." together with the proposed amendment. This suggested edit maintains the responsibility of the retailer to work with their customer to resolve issues and complaints. The customer always has the right to contact the Board and this edit does not take away that right.
- Attachment C, point 7.3I indicates that OEB staff will determine if an extension to the response timeline will be provided to the retailer, when requested. It is suggested that staff respond within a defined period of time ahead of the retailer's response deadline. This will work to ensure the retailer is aware of the status of their request and will have as much time as possible to complete their response.

If these edits are accepted they may also apply to the other codes to be amended.

Trusting these comments are clear, if however you need clarification please contact myself directly at jdezell@amo.on.ca or 416-971-9856 ext 306.

Sincerely,

A handwritten signature in black ink that reads "Judy Dezell".

Judy Dezell
Director AMO Enterprise Centre, Business Partnerships and LAS