

December 6, 2016

Submitted by email to: [boardsec@ontarioenergyboard.ca](mailto:boardsec@ontarioenergyboard.ca)

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

Dear Ms. Walli:

**RE: Issuance of Revised Proposed Consumer Facing Materials OEB File No.:EB-2015-0268**

Just Energy Ontario L.P. ("Just Energy") has assessed the content and the impact of the Ontario Energy Board's ("Board's") proposed revisions to the Tip Sheet, Dual Fuel and Renewal Disclosure Statement and Four Price Comparison templates issued on November 29, 2016 and December 5, 2016. Just Energy is supportive of the focus on consumer protections; however, have a number of concerns regarding the necessity, harshness and fairness of some of these proposed changes as well as the timing for implementation of these changes. The majority of Just Energy's change requests centers around maintaining neutrality in the portrayal of energy retailers and distribution companies. We have tracked our change requests within the regulatory instruments for the Board's ease of reference and understanding.

**Disclosure Statements**

With respect to the Board's proposed revisions to the dual fuel and renewal Disclosure Statements, Just Energy proposes the changes that are tracked in the enclosed dual fuel Disclosure Statements which also pertain to, as applicable, the renewal Disclosure Statement. Just Energy is concerned with the ability to carbon capture the consumer's acknowledgement of the Disclosure Statement now that the Board has proposed a folded booklet version.

There are instances where the term "energy contract" is used and instances where the term "contract" is used. Just Energy request the Board maintain consistency and use the term "energy contract". In addition, statements reflecting who energy retailers are not suggests that either energy retailers are unregulated or do not have to abide by the Board's Code of Conduct and its license conditions. In an effort to add balance to these statements, Just Energy suggests the Board include language along the lines of; "Energy retailers are licensed by the OEB and are required to adhere to the OEB Code of Conduct".

**Price Comparisons**

With respect to the Board's proposed revisions to the natural gas and electricity Price Comparisons, Just Energy advises that in our November 15, 2015 response, we requested the Board's expedited review and consultation process so as to give energy retailers enough time for implementation given the extensive nature of the changes from a technology and business operations standpoint. Just Energy is awfully disappointed and considers it extremely unreasonable and undue for energy retailers to be given significant revisions to previously proposed Price Comparisons for review and comment 16 business days

prior to implementation. This implementation time is significantly reduced when accounting for reduced staff owing to the holiday season, annual holiday wind down of IT infrastructure for risk mitigation purposes as well as time the Board will take to supply retailers with final versions. Given the aforementioned, the requirement to implement other regulatory instruments issued within the last few days by January 1, 2017 is impossible, Just Energy request that the implementation of the Price Comparisons be deferred to July 1, 2017. We note that Distributors were granted an implementation deferral for the Board's proposal to make retail contracts more visible on the bill. Just Energy is requesting the same and submits that energy retailers should not be penalized for the Board's seeming mismanagement of its administrative and consultation process.

Just Energy's automation system relies on a word template and it would be an unnecessary strain on resources to require energy retailers to manual edit PDF templates via a PDF viewing software. As such, Just Energy request that the OEB not renege on its commitment to provide word versions of the Price Comparison Forms.

Just Energy strongly opposes the Board's proposal of rolling up the three time-of-use bill lines to a single electricity bill line in Table A. This attempt to simplify electricity residential Price Comparison eliminates transparency and deflates efforts of providing consumers with a true comparison. It also gives the impression that distributors offer flat bill or fixed prices which could lead to confusion.

Just Energy is concerned with the ability to carbon capture the consumer's acknowledgement of the Price Comparison Sheet now that the Board has proposed a folded booklet version.

We further submit tracked changes and comments in the enclosed residential natural gas and electricity Price Comparisons. These change requests and comments also pertain, as applicable, to the non-residential natural gas and electricity Price Comparisons.

### **Tip Sheet**

With respect to the Board's proposed Tip Sheet requirement, Just Energy proposes the changes that are tracked in the enclosed Tip Sheet. There are instances where the term "energy contract" is used and instances where the term "contract" is used. Just Energy request the Board maintain consistency and use the term "energy contract". In addition, the statement "Energy contract prices are not regulated by the Ontario Energy Board (OEB)" indirectly suggests that either energy retailers are unregulated or do not have to abide of the Board's Code of Conduct and license conditions. In an effort to add balance to this statement, Just Energy suggests the Board include language along the lines of; "Energy retailers are licensed by the OEB and are required to adhere to the OEB Code of Conduct".

### **Conclusion**

Just Energy requests the Board consider deferring the implementation of the proposed Price Comparisons until July 1, 2017 owing to the unreasonable timeframe energy retailers will be given for implementation.

Just Energy is committed to supporting Ontario's goal of enhanced consumer protection and hopes that it can be a collaborative partner with the Board in the development and enhancement of regulatory instruments that meet this goal, while continuing to allow consumers to efficiently and effectively choose the best products to meet their needs.

Just Energy is happy to answer any further questions you may have either by phone or in person. Thank you again for your consideration of this submission, and we look forward to participation in future consultation activities.

Sincerely,



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Fax: 905.564.6069  
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**Attachment A**  
**Revised Proposed Tip Sheet**



# Important Information About Electricity And Natural Gas Contracts



No one can sign you up for an energy contract while they are at your home.



Take Your Time

## Questions Or Concerns?

The Ontario Energy Board is the independent regulator protecting electricity and natural gas consumers in Ontario.

Contact us. We're here to help.

**Ontario Energy Board Consumer Relations**

Hours: 8:30 a.m. – 5 p.m., Monday to Friday

In Toronto: 416-314-2455

Toll Free: 1-877-632-2727

TTY: 1-844-621-9977 (toll-free within Ontario)

ConsumerRelations@OntarioEnergyBoard.ca

@OntEnergyBoard

OntarioEnergyBoard.ca

This document is also available at [OntarioEnergyBoard.ca](http://OntarioEnergyBoard.ca) in the following languages:

- Arabic • Farsi • Hindi • Italian • Somali
- Portuguese • Punjabi • Chinese • Spanish
- Vietnamese • Tamil • Urdu

Ce document est aussi disponible en français.



## NEW RULES



## Important Information About Electricity And Natural Gas Contracts

1. No one can sign you up for an energy contract while they are at your home.
2. Take your time. Don't feel pressured.
3. Know your rights. **Read this first.**

# Know The Facts

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## Know Your Rights.

- The energy retailer's salesperson must give you a business card and show their company ID badge.
  - Your utility bill is private. It contains personal information like your account number and energy usage. The energy retailer only needs this information if you decide to enter into a contract.
- 



## Energy Retailers Can't Sign You Up For A Contract While They Are At Your Home.

- Energy retailers can come to your home and give you information but may not leave a copy of a contract with you.
  - You have a choice: You may decide to enter into an energy contract or purchase your electricity or natural gas from your utility. Energy contract prices are not regulated by the Ontario Energy Board (OEB).
  - Your home will continue to have natural gas or electricity whether or not you enter into a contract.
  - With, or without, an energy contract, you will be eligible for conservation and other programs from government or your utility
- 



## Savings Are Not Guaranteed.

- An energy contract may not save you money. Do your homework. Take the time to review and compare the contract offer and the prices charged by your utility. Make sure you understand what you will pay under the contract.
- 



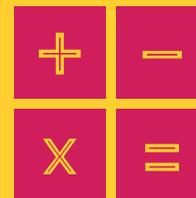
## Energy Retailers Are Not Your Utility, The Government or The OEB.

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## Next Steps: If You Choose A Contract.

- If you move forward with an energy contract, the energy retailer must give you more information to review. Make sure you receive:
    - The Energy Contract.
    - A Disclosure Statement with important information about energy contracts from the OEB.
    - A Price Comparison Sheet for electricity and one for natural gas; depending on what you want to buy from the energy retailer.
- 



## Use The OEB's Online Bill Calculator To Compare Prices

Before you enter into a contract, get a current price comparison. Use your own utility bill, the contract price offer and the OEB's bill calculator.

Go to [OntarioEnergyBoard.ca](https://www.ontarioenergyboard.ca)

**Attachment B**

**Revised Proposed Dual Fuel  
Disclosure Statement**



# Important Information About Electricity And Natural Gas Contracts

Before You Sign Up, Know The Facts.

## We're Here to Help

Contact us if you have questions or concerns:

### Ontario Energy Board Consumer Relations

Hours: 8:30 a.m. – 5 p.m., Monday to Friday

In Toronto: 416-314-2455

Toll Free: 1-877-632-2727

TTY: 1-844-621-9977 (toll-free within Ontario)

ConsumerRelations@OntarioEnergyBoard.ca

 @OntEnergyBoard

 OntarioEnergyBoard.ca

## Acknowledgement

I have received this Disclosure Statement as required by law. This Disclosure Statement is not part of the contract.

\_\_\_\_\_  
Signature

Sign and keep this document for your records.

\_\_\_\_\_  
Date

This document is also available at [OntarioEnergyBoard.ca](http://OntarioEnergyBoard.ca) in the following languages:

- Arabic • Farsi • Hindi • Italian • Somali
- Portuguese • Punjabi • Chinese • Spanish
- Vietnamese • Tamil • Urdu

Ce document est aussi disponible en français.



## DISCLOSURE STATEMENT



## Important Information About Electricity And Natural Gas Contracts

# Before You Sign Up, Understand:

1. The Price
2. Your Rights
3. Your Responsibilities

# The Ontario Energy Board

PROTECTING YOU

The Ontario Energy Board (OEB) is the independent regulator protecting Ontario's electricity and natural gas consumers.

This information was prepared by the OEB. Please read it carefully.

## The Facts

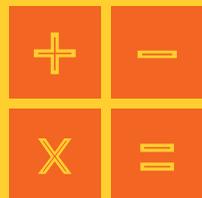
### You Do Not Have To Enter Into A Contract.

- You have a choice: You may decide to enter into an energy contract or you can purchase electricity or natural gas from your utility. Energy contract prices are not regulated by the OEB.
- Your home will have natural gas or electricity whether or not you sign a contract.
- With, or without, an energy contract, you will still be eligible for conservation and other programs from government or your utility.

### Savings Are Not Guaranteed

- The OEB does not set prices included in the energy retailer's contract. Make sure you understand what you will pay under the contract.

### Energy Retailers Are Not Your Utility, The Government or The OEB.



### Use The OEB's Online Bill Calculator To Compare Prices

Before you enter into a contract, get a current price comparison. Use your own utility bill, the contract price offer and the OEB's bill calculator.

Go to [OntarioEnergyBoard.ca](http://OntarioEnergyBoard.ca)

## Before You Sign Up WHAT YOU NEED TO KNOW

### Do your homework. Don't be pressured.

The energy retailer must give you the following documents. Take the time to read all the information.

- The Energy Contract
- A Price Comparison, one for electricity and one for natural gas

If these documents were not provided to you, call the OEB.

### Understand Payment Options.

- If you are on an equal payment plan, make sure you ask your electricity utility if you can stay on their plan if you enter into a contract.

### Remember, You Are Entering Into A Legal Agreement.

### There will be other charges.

An energy contract only applies to part of your bill.

- If you switch to an energy retailer, you still have to pay other charges to your utility companies to have your natural gas and electricity delivered to your home.
- The Global Adjustment (GA) accounts for the differences between the market price of electricity and the rates paid to regulated and contracted generators, and for conservation programs.
- All electricity customers pay a portion of the GA. Under an electricity contract, you will start to see that the GA is itemized as a separate line on your bill.

- The contract is a legal agreement between you and an energy retailer. When you sign, you have rights and you also have responsibilities.



### You Can Change Your Mind

**You can cancel the contract with no penalty:**

- Within 10 days of signing up for the **contract**.
- Within 30 days after you receive your second bill under the contract. You will still have to pay your bill.
- You can cancel at any other time but may have to pay a cancellation fee. Read

your contract and know the cancellation rules and cost.

### Confirming the contract

- You will be contacted 10-45 days after you've entered into the contract to verify that you wish to continue with it. If you do not want to continue with the contract, you can say so. You will not have to pay a cancellation fee.

**Attachment D**

**Revised Proposed Natural  
Gas Price Comparison  
Template for Residential  
Consumers**

## Natural Gas Price Comparison

Before You Sign Up, Compare Prices

## Still Have Questions?

Contact the energy retailer that gave you this sheet or the Ontario Energy Board.

### Ontario Energy Board Consumer Relations

Hours: 8:30 a.m. – 5 p.m., Monday to Friday

In Toronto: 416-314-2455

Toll Free: 1-877-632-2727

TTY: 1-844-621-9977 (toll-free within Ontario)

ConsumerRelations@OntarioEnergyBoard.ca

 @OntEnergyBoard

 OntarioEnergyBoard.ca

## Acknowledgement

I have received this Price Comparison Sheet as required by law.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

This Price Comparison Sheet is not part of the contract. Sign and keep it for your files.

NATURAL GAS | RESIDENTIAL



## Natural Gas Price Comparison

# Before You Sign Up, Compare Prices

Optional Retailer Document Control no. [field]

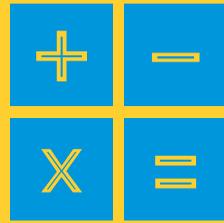
Rev.: [field]

Valid from January 1, 2017 to  
March 31, 2017

# Understanding the Price Comparison

This Price Comparison compares only the price consumers pay for the natural gas commodity bought from ABC Utility (Table A) to the price offered by the energy retailer (Table B). This is not a total bill comparison

The information in Table A and on this page was prepared by the Ontario Energy Board (OEB). Table B and other information was prepared by the energy retailer.



## Use The OEB's Online Bill Calculator To Compare Prices

To compare prices based on your own natural gas use, use your current utility bill, the contract price offer and the OEB's bill calculator.

**Go to [OntarioEnergyBoard.ca](http://OntarioEnergyBoard.ca)**

Table A shows the prices set by the Ontario Energy Board (OEB) and charged by ABC Utility. These prices are affected by the market price of natural gas and can change every three months.

Even if you switch to an energy retailer, you will still have to pay other charges to have your natural gas delivered to your home by ABC Utility.

These charges include Delivery, Storage and Customer charges as well as taxes. Table B shows you whether Transportation is a separate charge or is included in the contract price being offered.

The energy usage shown represents the typical household's natural gas usage for one month. Your actual monthly natural gas use may be different.

TABLE

**A** Price if you purchase your natural gas from ABC Utility:  
These prices are set by the OEB.

<b>Natural Gas Supply:</b> 255 m <sup>3</sup> x 13.0967 cents	<b>\$33.40</b>
<b>Transportation:</b> 255 m <sup>3</sup> x 6.4714 cents	<b>\$16.50</b>
<b>*Estimated Total</b>	
<b>\$49.90 per month</b>	

TABLE

**B** Natural Gas Prices offered under Contract by:  
[field]

*This price is not regulated by the OEB.*

<b>Natural Gas Supply:</b> 255 m <sup>3</sup> x [field] cents	[field]
<b>Transportation:</b>	[field]
[Energy Retailer field]	[field]
[Energy Retailer field]	[field]
<b>*Estimated Total</b>	
<b>[field] per month</b>	

\*You will also have to pay charges to your utility including Delivery and Customer charges as well as taxes.

## Description of Contract Price Offer

The Natural Gas Contract Price information below and in Table B above has been prepared by: [company name field]. It has not been reviewed or approved by the OEB.

[description field]

**Attachment E**

**Revised Proposed Electricity  
Price Comparison Template  
for Residential Consumers**

# Electricity Price Comparison

Before You Sign Up, Compare Prices

## Still Have Questions?

Contact the energy retailer that gave you this sheet or the Ontario Energy Board.

### Ontario Energy Board Consumer Relations

Hours: 8:30 a.m. – 5 p.m., Monday to Friday

In Toronto: 416-314-2455

Toll Free: 1-877-632-2727

TTY: 1-844-621-9977 (toll-free within Ontario)

ConsumerRelations@OntarioEnergyBoard.ca

 @OntEnergyBoard

 OntarioEnergyBoard.ca

## Acknowledgement

I have received this Price Comparison Sheet as required by law.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

This Price Comparison Sheet is not part of the contract. Sign and keep it for your files.

ELECTRICITY | RESIDENTIAL



Electricity Price Comparison

# Before You Sign Up, Compare Prices

Optional Retailer Document Control no. [field]

Rev.: [field]

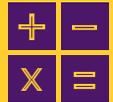
Valid from November 1, 2016  
to April 30, 2017

# Understanding the Price Comparison

This Price Comparison compares only the price consumers pay on the Electricity line of the bill from their utility (Table A) to the price of electricity offered by the energy retailer (Table B). This is not a total bill comparison.

The information on this page and in Table A was prepared by the Ontario Energy Board (OEB). Table B and other information in this Price Comparison was prepared by the energy retailer.

Table A shows the prices that are billed by your utility based on time-of-use prices as set by the OEB. These prices can change every May and November.



## Use the OEB's Online Bill Calculator To Compare Prices.

To compare your total bill costs based on your own electricity use, use your current utility bill, the contract price offer and the OEB's bill calculator.

Learn more at [OntarioEnergyBoard.ca](http://OntarioEnergyBoard.ca)

## Before Comparing Prices

Here are key things you need to know:

### 1. Other Charges

Even if you switch to an energy retailer, you will still have to pay other charges each month to have your electricity delivered to your home by your utility.

These charges include Delivery and Regulatory charges as well as taxes.

### 2. The Global Adjustment (GA)

The GA accounts for the differences between the market price of electricity and the rates paid to regulated and contracted generators, and for conservation programs.

All electricity consumers pay a portion of the GA. The electricity prices offered by your utility include an estimate of the GA.

If you switch to an energy retailer, you will

still have to pay your share of the GA and it will appear as a separate line item on your electricity bill. The GA is calculated, and can change, each month. Learn more about the GA at [OntarioEnergyBoard.ca](http://OntarioEnergyBoard.ca)

### 3. Time-of-Use Pricing

Under time-of-use pricing, the amount you pay for electricity depends on when you use it.

A typical household uses roughly:

- 65% (or 487.5 kWh) during Off-Peak hours when prices are lowest
- 17% (or 127.5 kWh) during Mid-Peak hours when prices are higher
- 18% (or 135.0 kWh) during On-Peak hours when prices are highest

These patterns are reflected in the Price Comparison in Table A on the right.

The table assumes the typical Ontario household's electricity use: 750 kWh per month. Your actual monthly electricity use may be different.

TABLE

### A Electricity Line Price From Your Utility



This is calculated using prices set by the OEB

750kWh based on typical time-of-use consumption pattern	\$83.54
<b>Global Adjustment:</b>	Estimated amount included in above prices as described on the left
<b>*Estimated Electricity Line Total</b>	<b>\$83.54 per month</b>

TABLE

### B Electricity Line Contract Price offered by:

[field]

These prices are not regulated by the OEB.

750 kWh @ [field] cents /kWh	[field]
[Energy Retailer field]	[field]
[Energy Retailer field]	[field]
[Energy Retailer field]	[field]
<b>Global Adjustment:</b>	Estimated amount included in above prices as described on the left
<b>*Estimated Electricity Line Total</b>	<b>[field] per month</b>

\*You will also have to pay charges to your utility including Delivery and Regulatory charges as well as taxes.

### Description of Contract Price Offer

The Electricity Line Contract Price information below and in Table B above has been prepared by: [company name field]. It has not been reviewed or approved by the OEB.

[description field]