



December 6, 2016

VIA E-MAIL AND CURRIER

Kirsten Walli
Board Secretary
Ontario Energy Board
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Kirsten Walli
Board Secretary

Re: Giving Effect to the OEB's Report on the Effectiveness of the *Energy Consumer Protection Act, 2010*

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

Summitt Energy Management Inc. ("Summitt") is writing in response to the Ontario Energy Board's ("Board") letter dated November 29, 2016 ("Letter") inviting comment on the following revised proposed documents:

1. Tip Sheet
2. Dual Fuel Disclosure Statement
3. Four Price Comparison templates

The OEB is proposing to move to a booklet format for all of the consumer facing materials, to be printed double-sided to a single legal size page with one fold, which will be provided to retailers in a PDF format for internet transactions.

Summitt is of the opinion that a booklet format would be less transparent to the consumer than the current formats; requiring consumers to have to "flip" through a brochure rather than having all of the content available to them on one easy to read plain language page. To add to the confusion, Board staff have not clearly identified the order in which pages of the proposed booklet format for the Tip Sheet, Dual Fuel Disclosure Statements and Price Comparison will be displayed to consumers.

Additionally, a booklet format would eliminate the ability for carbon copy printing requiring consumers to have to sign multiple times.

Summitt would also prefer to receive copies of approved price comparisons in the current format provided by the OEB. Summitt does not want to further add to the complexity of the amount of significant changes to the consumer facing materials needing to be implemented by January 1, 2017.

Summitt is also of the opinion that Board staff need to provide proposed versions of the reformatted materials for viewing online as soon as practicable. Summitt needs sufficient time to review the proposed versions and confirm, whether or not, the proposed versions will be compatible with Summitt's online sign up methods.

Attachment A: Revised Proposed Tip Sheet

The revised proposed tip sheet does not provide a description of the difference between utility supplied energy and retailer supplied energy. It is Summitt's understanding that this tip sheet will be the only document that can be presented and left with the consumer, at the consumer's home.

Therefore, Summitt requests that Board staff add a section to describe utility supplied energy and add a fillable section so that a retailer can provide a description of its current product offering. Therefore, in absence of the ability to provide a copy of the price comparison, a description of the difference between utility supplied energy and retailer's product offering is needed in order to properly inform the consumer of their options.

Furthermore, Summitt is of the opinion that the "Next Steps: If You Choose a Contract" section is misleading to consumers as it insinuates that the consumer should be asking the retailer for a copy of the contract, disclosure statement and price comparison to be left behind at the consumer's home. This section appears to be in contradiction to the section that states "Energy Retailers Can't Sign You Up For A Contract While They Are At Your Home". Summitt is of the opinion that both sections should be combined with each other in order to avoid any potential confusion on behalf of the consumer.

Attachment E&F: Revised Proposed Electricity Price Comparison Template for Residential Consumers and Non-residential Consumers

Table A for both attachments E and F do not provide the current time-of-use prices to a consumer but rather estimates, at best, the consumer's consumption by blending all three time of use prices into one amount. Summitt is of the opinion that this "blended price" approach is extremely misleading and does not provide consumers with sufficient information for them to make an informed decision.

Providing residential and commercial consumers with an average electricity use pattern does not allow them to accurately compare a retailer's offer to that of the current time-of-use pricing.

Additionally, Summitt believes that for true transparency to the consumer, table A needs to display the global adjustment cost in the exact same format as table B. This will allow a consumer to accurately review and assess, based on their unique consumption history, whether the retailers offer is right for them.

Summitt believes that failing to display the time-of-use prices and actual global adjustment cost in table A will most definitely lead to consumer confusion and increased consumer inquiries and/or complaints. Summitt is of the opinion that this proposed approach to the price comparison defeats the purpose and intent of the consumer facing document.

Yours truly,



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