

April, 17 2009

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 2300 Yonge Street  
Toronto, ON  
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**Your Proceeding: EB-2007-0722**

Dear Ms. Walli:

**Re: Stratacon Inc. ("Stratacon") Comments on EB-2008-0150**

We are pleased to provide the following comments in respect to the Ontario Energy Board Report of the Board EB-2008-0150 (the "Report") and the accompanying Staff Report.

Stratacon believes that the Low-Income Energy Assistance Program is an excellent initiative and we wholeheartedly support the implementation of a universal program. Stratacon is both ready and anxious to participate in this program.

While we generally agree with the report we would like to make the following specific comments:

1. Consumers in Multi-Residential Units and Implementation (Sections 6 & 7 of the Board Report)

The Staff Report (Section 4.1 pg 23) states "The Government has not deviated from its intent to install smart meters in the dwellings of all residential consumers in Ontario. Board staff is of the view that it is important to maximize the incentive for all consumers to shift consumption from peak periods in order to maximize the benefits of the significant investment in smart meters."

Stratacon strongly supports the rollout of Smart sub-meters throughout Ontario. The Conservation benefits of implementing Smart sub-metering in multi-residential buildings range from 20 to 40% without any additional cost to the government, consumers or landlords. However, the implementation in multi-residential buildings has been put in question by the OEB Compliance Bulletin 200901 and by the fact that the existing sub-metering code only applies to condominiums and not other multi-residential complexes. **In order to implement the LEAP program by November 2009, a clear regulatory framework for Smart sub-metering in Multi-residential buildings must be in place well in advance of this date.**

2. Consumers in Multi-Residential Units and Implementation (Sections 6 & 7 of the Board Report)

The Staff Report (Section 7 pg 91) states that “There is no meaningful way to allocate a landlord’s bulk metered costs to individual rental units unless the units are individually metered, and even then it is not within the Board’s purview to mandate the terms of rental agreements. Tenants whose energy costs are included in rent are not consumers of the distributor. As such, Board staff does not believe it is appropriate for distributors to provide assistance to tenants whose energy costs are included in rent.”

Unless Smart sub-metering is implemented in multi-residential buildings the LEAP program will unfairly discriminate against tenants in buildings which are not Smart sub-metered. This is very troubling because there is proportionately much greater need for assistance in multi-residential buildings. **In order to implement a non-discriminatory LEAP program by November 2009, a clear regulatory framework for sub-metering in residential complexes must be in place.**

3. Consumers in Multi- Residential Units (Section 6 of the Board Report)

**Stratacon is of the view that Smart Sub-metering companies should be required to contribute to the LEAP program and their customers are eligible for assistance on the same basis as other Distributors.** Specifically Sub-metering companies should be required to make a minimum contribution based on their revenue as part of their Smart Sub-metering license that is comparable to other distributors. The contribution mechanism must take into account the amount that may have already been submitted by the distributor at the building’s bulk meter. Although the OEB has suggested that sub-metering companies be part of the LEAP program, Stratacon believes strongly in the LEAP initiative that it will contribute to LEAP whether it is made mandatory or not.

4. Education and Outreach (Section 8 of the Report)

Stratacon recommends that it be mandatory for residents in a building that is Smart sub-metered to be educated on conservation to the same minimum standard as other distributors. In this respect residents must receive an information package and a live information seminar upon implementation of Smart sub-metering in an existing building and regularly thereafter receive education to the same level that other distributors are required to provide education.



5. Implementation (Section 7.4 of the Report)

Stratacon would welcome an opportunity to participate in a LEAP Implementation Working Group.

Regards,

John Macdonald  
President and CEO