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

File no. EB-2009-0111

This submission is to show the following to the Board.

- (1) Why it should NOT authorize exempt distributors, more particularly owners of rental apartment buildings or these owners' representatives, to install smart sub-metering systems.
- (2) Why, in cases where the systems are already installed, it should authorize their use to bill tenants only for those tenants that consent and under the further condition that the landlord or its representative has done two things,
 - (a) Supplying tenants with a realistic estimate of how high their total electricity bills would be under smart metering. A realistic estimate would include possible fixed charges and take into consideration household size and whether or not household members are at home during the day;
 - (b) Reducing the rent by the amount of the realistic estimate.
- (3) Why landlords or their representatives, in the unwelcome event that installing smart metering systems for their tenants in apartment buildings is going to be authorized after all, should not be free to choose a licensed smart sub-metering provider. They should be forced to use the meters and billing services of the utility their apartment buildings get their electricity from. This will prevent exploitative fixed charges of the kind illustrated below.

I am a tenant in an apartment building managed by Briarlane Rental Property Management Inc. (85 Spy Court, Suite 100, Markham, ON, L3R 4Z4) on behalf of the building owner, Ferrand Construction Ltd. Last year the landlord's representative announced smart metering would be introduced. It was suggested tenants had no choice and that if you were careful with electricity use the bills should be no higher than the amount by which the rent was going to be reduced, namely \$24.26 per month. As a result from September 1, 2008 till April 1, 2009 I was billed for electricity by Stratacon, the smart sub-metering provider imposed by the landlord's representative. Below is an overview of the electricity bills I received; it doesn't go till April 1 and ends on December 25th because that's when I went on a long sojourn out of town and started having bills with zero consumption charges because I had removed my apartment's fuses. As the overview shows, my electricity consumption is low and comes to about \$22.33 on a monthly basis, which happens not to be far from the landlord's representative's estimate of \$24.26.

However, each bill, even those received after December 25 with zero consumption charges, came with a whopping administration fee of \$12.00 and no warning had ever been given by the landlord's representative about that fee. So here we have the outrageous situation that a low income senior citizen like myself who is frugal with electricity pays a heavy penalty for being forced by the landlord to undergo smart metering by this Stratacon company. The penalty comes to about 30% of the average monthly consumption charges. There would have been no administration fee if the smart meters had come from Enersource Hydro Mississauga.

Summary of bills I received from smart sub-metering provider Stratacon Inc., 641 Chrislea Rd., Unit 8, Woodbridge, ON

Period Start	Period End	Billing Days	Distribution Usage Rate	Regulated Charge	Energy Charge	Total Consumption Charges	Administration Fee
1-Sep-08	17-Oct-08	46	5.23	12.20	18.54	35.97	12.00
17-Oct-08	14-Nov-08	28	2.94	7.24	10.99	21.17	12.00
14-Nov-08	16-Dec-08	32	2.91	7.81	11.54	22.26	12.00
16-Dec-08	25-Dec-08	9	0.83	2.09	3.29	6.21	12.00
115						85.61	

Zero consumption from Dec 25, 2008 to April 1, 2009 due to sojourn out of town. Each bill with \$0.00 for consumption nevertheless also imposed a \$12.00 administration fee.

Average consumption charge per month (of 30 days):	$30/115 * 85.61 = \mathbf{\$22.33}$
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This example shows that rental apartment building owners or their representatives should not be allowed to install a smart sub-metering system and that if they have already installed it, its use to bill tenants should be subject to the severe restrictions expressed in points (2) and (3) at the beginning of this letter.

To be considered also is that the institution of smart sub-metering providers is an invitation to abuse in the context of rental apartment buildings. If landlords are unrestricted in choosing a provider, providers will be tempted to offer "incentives" to landlords to get their patronage because they can recuperate them through high fixed charges. The lower a tenant's income, the more unfair and invidious these charges are.

Sincerely,