

Ontario Energy Board
PO Box 2319
2300 Yonge Street, Suite 2700
Toronto, Ontario
M4P 1E4

October 20, 2009

Attention: Ms. Kirsten Walli, Board Secretary

RE: Request for comments by October 23 on the issue of: Bill Issuance and Payment EB-2007-0722

Comment Submitted by:

Company: Energy@Work

Address: 250 The Esplanade, Suite 401A. Toronto, Ontario. M5A 1J2

Phone: 416 642-0571

Fax: 416 352-7424

Contact: Scott Rouse, Managing Partner

Email: Scott.Rouse@Energy-Efficiency.com

Three paper copies of this comment have been mailed to:

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
Toronto, Ontario
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Attention: Ms. Kirsten Walli, Board Secretary

Re: Request for comments by October 23 on the issue of: Bill Issuance and Payment to follow the industry standard of net30days.

EB-2007-0722 Proposed Amendments to the Distribution System Code, The
Retail Settlement Code and the Standard Supply Service Code

Dear Ms. Walli:

We thank the Ontario Energy Board (OEB) for identifying and addressing the consumer payment period as outlined in proposed section 2.5.3 of the DSC, revised and renumbered as section 2.6.3 for a common minimum bill payment period for all customers.

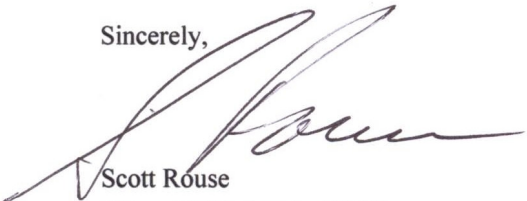
As stated in the Notice of Revised Proposal EB-2007-0722, "the Board believes 16 days would be appropriate for all customers under revised proposed section 2.6.3 of the DSC." Energy @ Work supports and, on behalf of our customers, requests that the standard minimum payment period be revised to the industry norm of net 30 days.

The purpose of deregulating the electricity market was to benefit the customer and provide standardized guidelines and a level playing field for all customers. The current practice of 16 days does not respect the industry norm.

Many Ontario Electricity Customers must coordinate bill payment with regional and often out of province payment programs. When accounting for late bill arrival and weekends/ holidays the 16 day window can be difficult to achieve resulting in late payment fines. Please see attached examples of billing cycle provided by our clients.

The utilities enjoy the privilege of monopoly. This makes it imperative that the OEB exercise common practicality to ensure that there is a level playing field. Utilities should be required to play by the same rules as every other business. The ability to pay a bill within net 30 days is a standard.

Sincerely,



Scott Rouse
PEng, CEM, MBA, CSDP,
Managing Partner,
Energy @ Work

cc: - 3 copies/attachments 2009-10-20 OEB bill issuance schedule
- electronic copy to www.erry.oeb.gov.on.ca

Table One

| Utility Bill Cycle Toronto | | | | |
|--|----------------|-----------|--------------------|--------------------|
| Utility | Statement Date | Due Date | # of calendar days | # of business days |
| Toronto | | | | |
| Property One Electricity (Enersource) | | | | |
| Aug-09 | 17-Aug-09 | 2-Sep-09 | 16 | 13 |
| Jul-09 | 16-Jul-09 | 4-Aug-09 | 19 | 14 |
| Jun-09 | 12-Jun-09 | 29-Jun-09 | 17 | 12 |
| Gas (Enbridge) | | | | |
| Aug-09 | 14-Aug-09 | 3-Sep-09 | 20 | 15 |
| Jul-09 | 14-Jul-09 | 4-Aug-09 | 21 | 16 |
| Jun-09 | 10-Jun-09 | 30-Jun-09 | 20 | 15 |
| Property Two Electricity (Enersource) | | | | |
| Aug-09 | 19-Aug-09 | 4-Sep-09 | 16 | 13 |
| Jul-09 | 17-Jul-09 | 4-Aug-09 | 18 | 13 |
| Jun-09 | 16-Jun-09 | 2-Jul-09 | 16 | 13 |
| Gas (Enbridge Gas) | | | | |
| Aug-09 | 20-Aug-09 | 9-Sep-09 | 20 | 15 |
| Jul-09 | 20-Jul-09 | 10-Aug-09 | 21 | 16 |
| Jun-09 | 18-Jun-09 | 8-Jul-09 | 20 | 15 |
| Property Three Electricity | | | | |
| Aug-09 | 17-Sep-09 | 4-Oct-09 | 17 | 12 |
| Jul-09 | 19-Aug-09 | 5-Sep-09 | 17 | 12 |
| Jun-09 | 17-Jul-09 | 5-Aug-09 | 19 | 13 |
| Gas | | | | |
| Aug-09 | 13-Sep-09 | 5-Oct-09 | 22 | 14 |
| Jul-09 | 13-Aug-09 | 2-Sep-09 | 20 | 14 |
| Jun-09 | 13-Jul-09 | 4-Aug-09 | 22 | 16 |
| Property Four Electricity | | | | |
| Aug-09 | 25-Sep-09 | 14-Oct-09 | 19 | 13 |
| Jul-09 | 26-Aug-09 | 12-Sep-09 | 17 | 13 |
| Jun-09 | 27-Jul-09 | 13-Aug-09 | 17 | 13 |
| Gas | | | | |
| Aug-09 | 2-Sep-09 | 25-Sep-09 | 23 | 17 |
| Jul-09 | 5-Aug-09 | 25-Aug-09 | 20 | 14 |
| Jun-09 | 1-Jul-09 | 22-Jul-09 | 21 | 15 |
| Property Five Electricity | | | | |
| Aug-09 | 10-Sep-09 | 27-Sep-09 | 17 | 11 |
| Jul-09 | 11-Aug-09 | 28-Aug-09 | 17 | 13 |
| Jun-09 | 10-Jul-09 | 29-Jul-09 | 19 | 13 |
| Gas | | | | |
| Aug-09 | 13-Sep-09 | 5-Oct-09 | 22 | 16 |
| Jul-09 | 13-Aug-09 | 2-Sep-09 | 20 | 14 |
| Jun-09 | 13-Jul-09 | 4-Aug-09 | 22 | 16 |

Notes:

- 1) # of calendar days inconsistent and vary from 17 to 23 days
- 2) # of business days as a result are often less than 2 weeks
- 3) A net 30 day would simplify and be comparable to the industry norm