

April 5, 2010

Kirsten Walli
Board Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge St
Suite 2700
Toronto, ON. M4P 1E4

Dear Ms. Walli

Re: Further proposed amendments to the Distribution System Code, the Retail Settlement Code and the Standard Supply Service Code: Customer Service, EB-2007-0722

Direct Energy (DE) welcomes the opportunity to provide the Ontario Energy Board (OEB) with its comments on the proposed amendments to the Distribution System Code (DSC), the Retail Settlement Code (RSC), and the Standard Supply Service Code (SSS) pertaining to customer service, issued March 12, 2010. DE supports the OEB's effort to continually improve customer service in the energy sector and is generally supportive of the proposed changes. DE would like to assist the OEB in further clarifying the proposed amendments to the above noted Codes by making the following comments and recommendations.

Distribution System Code:

Numeral 9 of the Proposed Amendments, Section 2.6.7 of the DSC (Computation of time):

DE recommends that Sundays also be added to the list of days not recognized as a "Business Day".

Numeral 14 of the Proposed Amendments, Section 7.10.1 of the DSC (Reconnection):

DE strongly requests that a rule be added to the above noted section to ensure that when reconnection of a customer occurs following termination for non-payment, LDCs reinstate the customer to the same status as prior to termination. For clarity, if a customer had previously been a retail customer prior to termination, the customer should be reinstated as a retail customer, and not defaulted to system supply as is the current practice. The current process of defaulting retail customers to system supply following reinstatement significantly increases the complexity and costs of transactions and effort by retailers and LDCs, and creates customer confusion.

While DE makes these comments under the heading of the DSC due to their location within the proposed amendments, the OEB may wish to consider this change take effect within Section 7.6 or 7.7 of the RSC.

Retail Settlement Code:

DE has no comments on the proposed amendments in the RSC, other than those noted immediately above.

Standard Supply Service Code:

Numeral 2 of the Proposed Amendments, Section 2.6.2 of the SSS (Equal Payment Plan):

DE believes that all customers should be treated equally. As such, DE recommends that regardless of the supply type chosen, all customers should be offered EPP billing arrangements. Both of the major natural gas utilities and many of the electricity utilities in the Province offer all customers this billing option regardless of whether the customer arranges for supply through the utility or a marketer or retailer. Requiring LDCs to offer EPP to customers on retail supply will not only ensure that all customers are treated fairly and equally, it will align all electric LDCs with the natural gas utilities in the Province.

DE would like to thank the OEB for the opportunity to comment on the proposed amendments to the DSC, RSC, and SSS. Should you have any questions or concerns with the above noted recommendations, please contact the undersigned.

Yours sincerely

Original signed by

Ric Forster
Director
Government & Regulatory Affairs
Direct Energy Marketing Limited