

Hydro One Networks Inc.

8th Floor, South Tower
483 Bay Street
Toronto, Ontario M5G 2P5
www.HydroOne.com

Tel: (416) 345-5700
Fax: (416) 345-5870
Cell: (416) 258-9383
Susan.E.Frank@HydroOne.com

Susan Frank

Vice President and Chief Regulatory Officer
Regulatory Affairs



BY COURIER

September 3, 2010

Ms. Kirsten Walli
Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
P.O. Box 2319
Toronto, ON.
M4P 1E4

Dear Ms. Walli:

**EB-2010-0245 – Notice of Proposal to Revoke and Re-Issue a Code – Retailer Code of Conduct –
Comments from Hydro One Networks**

In accordance with the Board's Notice of Proposal to Revoke and Re-Issue the Retailer Code of Conduct, issued August 12, 2010, Hydro One Networks has reviewed the Board's proposal. Hydro One Networks has no material comments. Our only comment is in the area of clarity from the customer perspective.

Three paper copies are being provided by courier to the Board and I have attached proof of successful submission of these comments through the Board's Regulatory Electronic Submission System as directed in the Notice.

Comment:

The phrase "*your local utility*" occurs eleven times in the Proposed Disclosure Statements for electricity, and four times in the Proposed Verification Call Scripts for electricity (excerpts are below). We feel that, in the minds of most of our customers, the deeply embedded perception of Hydro One is that of a utility which spans the province. In addition, in customer communications, we generally do not refer to ourselves as "*your local utility*". Therefore, we feel that use of the term "*your local utility*" may make less clear to the customer, which utility the Disclosure or Script refers to.

Therefore, we suggest that for electricity, "*your local utility*" be replaced by a phrase something like "*the utility that delivers power to you*". However, in some of the instances, instead of that replacement, it may be preferable to just delete the word "*local*".

Similarly, there are two references to “*the consumer’s local electricity distributor*” in the Proposed Code itself (excerpts are below). The Code would be read by fewer customers than see or hear the Disclosures and Scripts, but it may help broader clarity to similarly replace “*the consumer’s local electricity distributor*” with something like “*the electricity distributor that delivers power to the consumer*”

Excerpts from the Proposed Code (**my bolding**):

Proposed Disclosure Statements (Attachment C):

“Important Information About Electricity Contracts”:

“- *The Retailer ... does not represent your **local utility**, and ...*”

“- *You may also cancel the contract ... and you will be transferred back to your **local utility** for your electricity supply ...*”

“Important Information About Renewing or Extending Your Electricity Contract”

“*You do not have to renew or extend your contract for electricity supply ... and you will be transferred back to your **local utility** for your electricity supply ...*”

Proposed Verification Call Script – Electricity:

“*Do you understand that [retailer name] is not your **local utility**, and ...*”?
Y/N”

“*If you change your mind within 30 days ... you may ... cancel the contract. ... and you will be transferred back to your **local utility** for your electricity supply*”.

Code body:

1.1.(a):

1. *Fair Marketing Practices*

1.1 *A retailer or salesperson of a retailer, when retailing to a consumer, shall:*

(a) *immediately and truthfully ... state that the retailer is not the consumer’s **local electricity distributor** and ...*

2.4.(a):

Identification badges

2.4 The identification badge referred to in section 2.3 shall ...:

*(a) clearly identify that the salesperson is acting on behalf of the retailer, is not a representative of the consumer's **local electricity distributor** and ...*

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank