

PowerStream Inc.

April 12, 2013

Proposed Direct Install Refrigerator Program

Board File EB-2013-0070

This letter of comment is provided in response to a notice published on April 11, 2013.

I am a residential customer of PowerStream and wish to oppose the inclusion of the \$4.1 million cost of the program on their 336,000 customers for the following reasons.

I believe the DIR Program is far better managed by the OPA on a province wide basis and the costs rolled into the Global Adjustment rather than being borne by PowerStream customers.

Market Access

1. PowerStream claims that the grocery market is hard to access. Given the dominance of a small number of national grocery chains (Loblaws, Sobeys, Metro, Shoppers Drug Mart & Walmart, Target etc), this market is very easily accessed through the corporate head offices of these chains.
2. Likewise the convenience store business is dominated by a few names such as Macs, 711, Jug City etc that can be accessed through corporate offices who, while not owning individual stores, generally control the type of refrigeration equipment used by franchisees.
3. Also the restaurant business is dominated by a few multi-national chains that can easily be accessed through corporate offices.

Program Duplication

1. In its letter of support, OPA is somewhat equivocal on whether the DIR program is duplicative.
2. OPA states a clear intention to introduce a similar program using the PowerStream program as a template.
3. If this is the case, then PowerStream can easily delay its program until OPA has introduced its program to Corporate offices. This will leave a smaller number of independent grocers, restaurants and variety stores to be approached by all participating LDCs.

Respectfully Submitted