

April 30, 2013

***Via Electronic mail***

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**RE: Just Energy Ontario L.P. ("Just Energy") Response to Board Staff Interrogatories -  
Application for Amendment to Gas Marketer and Electricity Retailer Licences;  
EB-2012-0435**

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Please find enclosed Just Energy's response to Board Staff's interrogatories with respect to its application for amendment to its Natural Gas Marketer Licence GM-2010-0152 and Electricity Retailer Licence ER-2010-0153 pursuant to the instructions set out in Board Staff's Letter of Direction dated March 13, 2013. Just Energy disagrees with the supposition put forth by AG Energy Co-operative Ltd. and Kitchener Utilities that a guarantee of consumer cost savings under certain conditions is not a savings guarantee. The structure of our proposed products offer a guarantee of savings over the term of their contract with Just Energy compared to the prices the customer would have otherwise paid had they remained with their local utility. The savings guarantee is accurate in all conditions, contrary to the position put forth by AG Energy Co-operative Ltd. and Kitchener Utilities, as the representation being made is that the customer will save compared to their local utility rates, which naturally fluctuate. In addition, Just Energy's view is that savings realized over the term of the Agreement is a true savings guarantee and thus does not have to be realized month to month.

Just Energy agrees that consumers should continue to be given the understanding of the message that energy costs savings are not guaranteed for products where energy cost savings are in fact not guaranteed. However, it would be confusing and inherently misleading to make this statement to consumers who have chosen a product where energy costs savings are guaranteed. Just Energy is also of the view that the proposed amendments to our natural gas and electricity retailers licenses are in accordance with the spirit of Energy Consumer Protection Act as it gives customers a competitive alternative to the options provided by their local utility.

Should you have any questions, please do not hesitate to contact Nola Ruzycki at 403.462.4299 or [nruzycki@justenergy.com](mailto:nruzycki@justenergy.com) or Frances Murray at 905.461.2360 or [fmurray@justenergy.com](mailto:fmurray@justenergy.com).

Sincerely,



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Encl.

Cc: (email only): Patrick McMahon, Union Gas  
Ric Forster, Direct Energy Marketing Limited