



ONTARIO ENERGY BOARD

BOARD STAFF SUBMISSION

**Canadian RiteRate Energy Corporation
("RiteRate")**

**Application for Gas Marketer Licence Renewal
EB-2013-0324**

November 14, 2013

Intended sales channels and RiteRate's future business model.

- RiteRate's plans to ensure compliance with all legal and regulatory requirements
- [REDACTED]

Financial Viability

Board Staff submits that based on the evidence and response to interrogatory No 1, the applicant can reasonably be expected to be financially responsible in the conduct of business.

Conduct

Gas marketers in Ontario are required to comply with the Act, *Electricity Consumer Protection Act, 2010* (the "ECPA"), regulations under these Acts and the Code of Conduct for Gas Marketers.

In 2011, RiteRate was found to have contravened section 12 of the ECPA and section 7 of Ontario Regulation 389/10 related to contract content requirements. RiteRate provided the Board with an Assurance of Voluntary Compliance in which it admitted to the contract deficiencies and committed to ensure they would be remedied. RiteRate paid an administrative monetary penalty in the amount of \$5,000.

Board staff reviewed RiteRate's interrogatory responses and, in particular, [REDACTED]
[REDACTED] In Board staff's view, it generally is not inappropriate for a company such as RiteRate to contract with a third party for the provision of services. Board staff notes that [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] Board staff notes that according to the Board records and as stated in the application, there have been very few complaints raised by consumers to the Board about the applicant in the last two years. This supports RiteRate's stated commitment to consistently comply with all regulatory and legal requirements.

Technical Capability

Board staff submits that according to the application RiteRate employs technical personnel with adequate experience and qualifications to provide responsive and quality

support for systems and processes in the gas market where RiteRate does business.

CONCLUSION

In consideration of the evidence filed, Board staff is of the view that RiteRate has the adequate technical and financial capabilities to operate effectively in the Ontario market. Board staff submits that there is no evidence to suggest that RiteRate is not conducting itself in a manner consistent with its regulatory and legal requirements. Board staff supports the renewal of RiteRate's gas marketer licence for a 5 year term.

All of which is respectfully submitted.