



January 8, 2015

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

Re: Consultation on the Effectiveness of Part II of the *Energy Consumer Protection Act, 2010*, Board File No.: EB-2014-0158

Dear Ms. Walli:

I am writing this letter on behalf of the Canadian Lamb Producers Co-operative, a national Co-op with a regional office and Members in Ontario. The Canadian Lamb Producers Cooperative is the only agri-food organization in Canada that is focused on increasing Member's Farm Cash Receipts by marketing Canadian lamb products from Members and building a national and international brand that will be owned by lamb producers. As our purpose is to increase farm cash receipts, we wish to comment on the Energy Consumer Protection Act and its processes. Any facet that would allow for choice and opportunity to enhance a farmer's bottom line would be of benefit to agriculture.

Ethical energy Co-operatives who do not participate in door-to-door residential sales should be considered outside of the scope of the ECPA for those people or entities that wish to participate in the Co-op. A simple waiver and proof of Co-op membership should be enough validation for the OEB in this segment and would allow an energy Co-op to act in the best interest.

The purpose of the *Energy Consumer Protection Act* (ECPA) is to protect the small consumer / residential user from bad or unfair practices of those that prey on the segment. I agree with that level of protection, however, think that there is yet another segment that needs consideration and that is a member owned, energy Co-operative.

The Co-operative model fundamentally works to benefit its membership, regardless of member size. Energy Co-operatives provide alternatives wherever they are desired. The consuming member is given choices based upon need – whether it is service level, length of contract or risk tolerance. The community of an energy Co-op allows for members to pool their requirements and resources and obtain benefits and savings through participation and ownership. Any large increase in the cost to serve hurts the membership. Further, the energy Co-op model does not operate in a vacuum. It competes on the open market against other options and as such must remain competitive and focused on the needs of those it serves. If the Co-op does not provide meaningful services at reasonably competitive prices, the

Co-op's usefulness is eliminated. Given that, it is a self-governing model and does not require the additional scrutiny that is provided to energy retailers in the small consumer space.

Ag Energy Co-operative Ltd. is a consumer-member owned, member-controlled Co-operative. It provides electricity and natural gas to its membership. It provides communication, education, internal and independent resources so its membership can make the best decision for them. Staff exists to support and communicate the members and the member is the centre of their efforts.

Working with a Co-operative is a choice that an individual makes. You pay a fee to join and fill out an application. You need to choose to belong and adhere to the requirements of the Co-op. The success of any Co-operative is to provide competitive services and additional benefits while operating in an ethical and transparent manner. Ag Energy has a track record of providing valued service to its Members for 26 years. It provides trusted advice that works with the Member's needs and what is best for them. The Co-op operates on a break even model and returns profits via patronage rebates, dividend payments or enhanced retained earnings. It provides a non-traditional alternative to other energy retailers.

Co-op's provide voice to their membership. Each Member has one vote, regardless of size. That vote and voice can be used at member meetings or in the choice of its Directors. The Member can express their voice and shape governance and strategy alongside their peers.

The OEB needs to curb or eliminate unfair business practices for small consumers. It also should encourage the benefit, choice and control that energy Co-operatives provide as they strengthen the local economy, create employment and provide community/social engagement by the very nature of the Co-op business model.

Energy consumers who want to exercise their choice of energy procurement should be given options. As it pertains to the ECPA, an enhancement to the existing practice would be to allow a waiver for small consumer members of an energy Co-operative.

Sincerest thanks for any support you provide to Ag Energy and other Co-operatives in Ontario.

Respectfully,

A handwritten signature in black ink, appearing to read "Terry Ackerman". The signature is written in a cursive style with a horizontal line above the name.

Terry Ackerman
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