

**BY E-MAIL & COURIER**

October 21, 2015

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

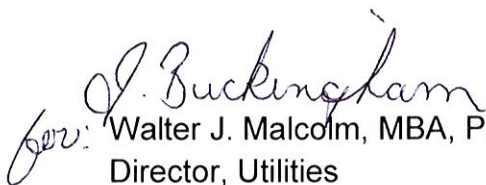
Dear Ms. Walli:

**Re: EB-2015-0268 – Notice of Proposal to Amend a Code and to Amend a Rule – Comments by the City of Kitchener (“Kitchener”)**

Pursuant to the Ontario Energy Board’s (“Board’s”) Notice of Proposal dated October 5, 2015, please find attached Kitchener’s comments.

If there are any questions, please contact me at your earliest convenience.

Sincerely,

  
Walter J. Malcolm, MBA, P.Eng.  
Director, Utilities

**NOTICE OF PROPOSAL TO AMEND A CODE AND TO AMEND A RULE**

**PROPOSED AMENDMENTS TO THE ELECTRICITY RETAILER CODE OF CONDUCT, THE CODE OF CONDUCT FOR GAS MARKETERS, THE RETAIL SETTLEMENT CODE AND THE GAS DISTRIBUTION ACCESS RULE**

**OEB FILE NO.: EB-2015-0268**

**City of Kitchener**

1) No comments

2)

a) *The OEB proposes to amend the RSC and the GDAR such that a distributor-consolidated bill issued to a low volume consumer that has a contract with a supplier must include a statement, in capital letters, to the effect that the consumer's supply is being provided under contract. The OEB also proposes to require distributors to provide for up to 500 text characters for the display of this statement, together with the supplier's name, telephone number, website, and e-mail address on the bill.*

i) Kitchener currently displays the supplier's name and telephone number on the bill.

ii) Kitchener is currently in the process of upgrading to a new Customer Relations & Billing System. The go live date is scheduled for January 4, 2016. As a result, there is a blackout for changes to the existing billing system as well as a blackout for changes to the new billing system. Kitchener will not be able to implement the changes until the new system is stabilized. The estimated time, provided by our project team, to implement the changes is approximately one year.

iii) The additional lines on the bill being proposed would increase the length of the bill where an additional page would be required. The increased number of pages will add additional postage costs for mailing the bills to our customers.

iv) The OEB is currently proposing that distributor-consolidated bills would require the statement; however, there are low volume customers on contract that are split-billing. Kitchener believes that customers on contract regardless of the billing method should receive the same information.

- v) The supplier's website and e-mail address are not fields currently captured in the billing system. In addition, Kitchener does not feel the information should be the responsibility of the bill supplier or be responsible for ensuring the information is up to date. If a decision is made to amend the GDAR EBT Standards to include these fields in an STR (Price Point Create and Price Point Change), development and testing for this change to the STR would not be completed for a January 1, 2016 implementation by Kitchener.
  
- b) *The OEB believes that there is merit in considering additional changes to the bill, and more specifically to requiring that the commodity cost based on the contract price and the commodity cost based on the system supply price appear on the bill.*
  - i) Kitchener currently displays the commodity cost based on the contract price on the bill.
  - ii) Same as 2) a) ii) above.
  - iii) The addition of the system supply price on the bill is likely to produce customer confusion resulting in an increase in activity in our customer contact center.
  
- 3) No comments
  
- 4) *To promote consumer awareness that their supply arrangements are changing as a consequence of having entered into a contract, the OEB proposes to amend the RSC and the GDAR to require distributors to provide written notice to low volume consumers of the switch to a supplier.*
  - a) Kitchener currently provides written notice to all consumers of any change in supplier: system gas to supplier, change in supplier, supplier to system gas.
  
- 5) No comments