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October 21, 2015

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, Suite 2700  
Toronto, Ontario M4P 1E4

Dear Ms. Walli,

**RE: 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  
Board File No. EB-2015-0268**

The following are Greater Sudbury Hydro Inc.'s (GSHi) comments to the 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.

### **Identifying low-volume consumers**

The current Electronic Business Transaction (EBT) process does not distinguish between consumer classes. This would require significant changes to both our Customer Information System and the EBT system.

### **Making retail contracts more visible on the bill (Amendment 2)**

We do not have the availability to display 500 text characters as requested. We currently display the supplier's name, in capital letters, along with their phone number. We feel this information is clearly visible to the customer.

We could request that our software vendor, if possible, include static retailer email and website information in their retailer setup to accommodate this without impacting the EBT system.

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Bill comparison between a retailer bill and an SSS bill can be found on the OEB's website. We propose that an insert be provided by the OEB directing consumers to the OEB's website. This insert could be included with invoices once per year.

#### **Written notice to consumer of the switch to a supplier (Amendment 4)**

A retailer currently receives an enrollment accept from the Distributor when a consumer has successfully been enrolled. We believe it should be a requirement of the retailer to provide this written notice. If the Distributor is charged with this responsibility, the retailer should provide fair and reasonable compensation to the Distributor. Only a small percentage of our customer base have retail contracts, and as such, any plan to attribute costs to non retail consumers would be unjust.

#### **Anticipated Costs**

The cost to implement these changes would possibly include:

1. Postage cost: we would see an increase in postage costs with mailing separate notices to consumers advising of their switch.
2. Programming cost associated with incorporating these new messages.

As stated previously, the number of our customers that currently have retail contracts represents such a small percentage of our consumer base, and if door to door sales are prohibited, this may decrease even more. We do not feel that enough customers are affected to justify such costs.

#### **Coming into Force**

We have a concern with respect to the proposed timeline of January 1<sup>st</sup>, 2016. We feel this is an unrealistic timeline considering that it coincides with OESP, DRC and OCEB changes that must be implemented by January 1<sup>st</sup>, 2016.

Yours truly,



Nancy Whissell  
Vice President - Corporate Service