October 29, 2015

**To:** **Kirsten Walli**
**Board Secretary**

**From: Electricity EBT Standards Working Group**

**Re: Giving Effect to the OEB's Report of the Effectiveness of the Energy Consumer Protection Act, 2010 (EB-2015-0268)**

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On October 8, 2015 the OEB requested that the EBT Working Group(s) review current EBT processes and identify any changes needed to support proposed amendments to the ECPA Regulation (as outlined in the October 5, 2015 Notice of Proposal to Amend a Code and to Amend a Rule). The group is to report back to the OEB with their findings by October 30, 2015.

It was clarified that the focus of this discussion was not to discuss the merit of the changes; but to identify EBT process/transaction changes that would be needed should the proposed amendments be adopted. The Notice of Proposal dated October 5, 2015 invites interested parties to provide comments directly to the OEB by October 21, 2015.

The request was sent to the distribution list of the Electricity EBT Working Group (Working Group) with an invitation to collectively discuss the proposed changes and any relevant issues related to the changes.

The Working Group met by teleconference on October 16, 2015 to discuss any issues or concerns related to EBT changes required as set out in the Notice. Potential issues are set out below.

**Low-Volume Consumers**

The Notice is specific to low-volume consumers; however current EBT processes do not distinguish between consumer classes and therefore would need to be applied to all retailer enrolled consumer bills.

a. If the EBT process were to distinguish between classes, significant CIS/EBT schema changes and testing be required.

**Amendment 2, *Making retail contracts more visible on the bill***

This amendment proposes the requirement for distributors to provide suppliers up to 500 characters for display on the bill.

a. It was unclear where this information is expected to be presented on the bill and in which section. It was also unclear if this information should be static or provided through the IBR. It was confirmed the intent is to provide the retailers name, phone number, website and email address, not the rate and other variable information.
    i. If provided through the IBR, the current method of transmitting retailer information is through the *Message Information* tag in the IBR. This tag currently has a limitation of a maximum of 80 characters, however many

utilities support less than this amount, which is outlined in individual Service Agreements.

   a. Comments were made that providing this much space on the bill would pose a significant space issue for distributors, however some retailers felt more space was needed
   b. It was also noted that some distributors place messaging in both English and French, increasing the space requirement.

ii. It was noted that some distributors store this information in their CIS and pull it for billing, while others pull it directly from the IBR transaction itself. Changes either way will increase effort and testing for many participants.

**Amendment 4, *Written notice to consumer of the switch to a supplier***

This amendment proposes the requirement for distributors to send consumers separate notification of the switch to a supplier.

a. This does not impact EBT processes, however many participants agreed that the current processes already meets this requirement. The suppliers name and phone number are already printed on all bills.
   i. Some distributors raised a concern related to the costs involved with this proposal, and specifically how these costs will be covered should this proceed.
      a. The discussion touched on a review of IMP charges however it was agreed that was outside of the scope for this group.

A general concern was that the proposed implementation timeline of January 1, 2016 was unrealistic. Distributors highlighted a number of changes in process with January 1, 2016 delivery dates (e.g.: OESP, DRC, OCEB). Adding this change, including testing, is not feasible.

Regards,

Kristine Innes
On behalf of the Electricity EBT Working Group