

October 30, 2015

**To: Kirsten Walli  
Board Secretary**

**From: GDAR 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 5, 2015, the Ontario Energy Board (OEB) gave notice of a proposal to amend certain rules and codes under section 45 and 70.2 of the *Ontario Energy Board Act, 1998*. Issued for comment were proposed revisions to its regulatory instruments. It was noted that the Electronic Business Transaction (EBT) Standards may be affected by these proposed changes.

On October 8, 2015, by letter, the OEB requested that the EBT Standards Working Group(s) review current EBT processes and identify any changes needed to support proposed amendments to its regulatory instruments. Each working group was asked to consider the changes and its effect on the EBT Standards and report back to the OEB with their findings by October 30, 2015.

The request was sent to the distribution list of the Gas Distribution Access Rule (GDAR) EBT Standards 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 20, 2015 to discuss any issues or concerns related to EBT changes required as set out in the Notice. Potential issues are set out below.

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

The OEB is proposing that the characters be increased to 500 text characters on the bill, where there is distributor-consolidated billing, to include the gas vendor's name, telephone number, website and e-mail address to improve the vendor's visibility on the bill.

Currently, all distributors include the vendor name and phone number on the bill. To increase the number of text characters to include additional information would require changes to various applications, which may include but not limited to, the EBT Standards, CIS systems, distributor online applications and bill presentment programs used by individual distributors and vendors. There is currently no ability to pass this additional information to the distributor using the current EBT system. Changes would have to be made to the EBT implementation guides and Point to Point Schemas. Using static data was considered but the Working Group felt that this was not an effective way to implement this change.

It is difficult to assess the length of time required to make the changes but it is estimated that it would take six months to one year. EBT changes would require the Working Group to meet to discuss the changes to EBT schemas, develop an implementation plan, and would require extensive market testing and changes to individual systems.

The Working Group reported that this change could be made but not in a timely manner and the

change would be costly. There was concern that the added information would push the billing information to a second page adding to total costs, including postage costs.

The proposed changes to section 6.1.4 of GDAR refer to distributed consolidated billing only. The Working Group felt this change should also apply to split billing.

With regard to the merit of considering additional changes to the bill to include both the commodity price based on the contract price and the commodity price based on the system supply price, the Working Group is in agreement that this would require system changes to accommodate the bill presentment. Generally, it is not anticipated that EBT changes would be required to implement this proposal.

The Working Group is of the view that this may cause additional customer confusion, drive up calls in the call center and impede market competition.

#### **Amendment 4 – Written Notice to consumers of the switch to a supplier**

The OEB is proposing to amend the Retail Settlement Code and GDAR to require distributors to provide written notice to low volume consumers of a switch to a supplier. In the discussion with the Working Group, it appeared that this requirement would not be difficult to meet although for some, it would require business process and IT changes. Some distributors already send a letter to customers when a switch is initiated. In general, distributors thought that they could meet this requirement with a lead time of up to six months to implement. It is not anticipated that any changes to the EBT Standards are required.

In terms of the proposed change under 10.5.4A(c) of GDAR, specifically that the letter should include the date on which the gas distributor expects the low volume consumer to receive their first bill from the gas distributor under the new supply arrangement, distributors felt that it would be difficult to specify the exact date of the next bill since billing dates change from month to month. Instead, one distributor requested that the requirement in the code could reference the billing cycle instead of the next billing date under the switch and the letter could state that “the billing cycle will remain the same” as an example.

The Working Group confirmed that these changes can be made; however, generally speaking, the main concerns are related to the timing of these changes and the cost of effecting these changes.

Regards,



Chris Marijan  
On behalf of the GDAR EBT Standards Working Group