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June 22, 2016

Via: email

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

Dear Ms. Walli:

**RE: Cap and Trade Regulatory Framework for the Natural Gas Utilities EB-2015-0363**

Please find comments of Just Energy Ontario L.P. ("Just Energy") with respect to the above matter. Just Energy appreciates the opportunity to provide its input in a number of areas on the Natural Gas Utility Cap and Trade Program Framework.

With respect to Bill Presentment, Just Energy submits that it is essential that the Cap and Trade charges have the same bill presentment for all consumers, regardless of the utility. This will provide for consistent messaging and decrease consumer confusion.

Just Energy strongly submits that all charges should be volumetric, m3, for the recovery of both the customer-related and facility-related obligation costs. For transparency, Just Energy agrees that the rates should be included on the utility approved tariff sheets.

Just Energy is of the view that the per-cubic meter charge for facility, administrative costs and customer related obligations must be included in the delivery charge on consumer bills and should be presented as a separate line item.

With regards to customer outreach and education component of the Cap and Trade framework, Just Energy submits that Gas Marketers can continue to be another avenue through which consumers can be educated as to the impact of the Cap and Trade program.

Just Energy submits that customers who have already elected to offset their carbon emissions should be credited for their selection against the charges related to their compliance with the Cap and Trade program. A standard protocol should be developed to ensure carbon offsets, bio-methane, or allowances are consistently procured.

Should you have any questions, please do not hesitate to contact Nola Ruzycki at 403.462.4299 or [nruzycki@justenergy.com](mailto:nruzycki@justenergy.com).

Sincerely,

Nola Ruzycki  
Vice President, Regulatory Affairs