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August 24, 2016

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

Re: Cap and Trade Framework for Natural Gas Utilities-Early Determination regarding Billing of Cap and Trade Related Costs and Customer Outreach EB-2015-0363

Energy Probe is writing in response to the Board's recent announcement, the Early Determination regarding Billing of Cap and Trade Related Costs and Customer Outreach.

We fully support IGUA's request that "Board provide the reasons in support of its Determination that carbon compliance costs should be blended rather than separately identified on customer bills."

Energy Probe's reasons for further clarification from the Board are:

1. Many of the submissions, including those from the utilities, commercial, industrial and institutional groups, as well as consumer representatives, supported a separate line item on gas bills for cap and trade related costs. This was one issue that united a very disparate group of gas customers and representatives. The Board, in its announcement, went against that consensus.
2. The evidence from the utilities – using the type of customer outreach programs that the Board has increasingly supported in recent years – showed that residential customers are very strongly in favour of having cap and trade costs presented on their own line item, rather than blended in with other delivery costs. The Board, in its announcement, provided no reasoning for why that evidence was inadequate.
3. Energy customers in Ontario – particularly electricity ratepayers – have in recent years seen a number of different line items on their monthly bills, including the Debt Retirement Charge and the Ontario Clean Energy Benefit. The Board didn't clarify why those charges, which are both a result of provincial policy, have been allowed on monthly bills and cap and trade costs must be rolled into other, more general, costs.

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4. We also support comments that the Board has in recent years increasingly highlighted greater transparency and engagement with consumers. Energy Probe views a separate line item – that clearly delineates the cost of a provincial policy – as building on those themes, while blending those costs in with other delivery charges as contrary to them.

Thank you for receiving the concerns of Energy Probe.

David.

David MacIntosh
Energy Probe Research Foundation