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September 1, 2016

Ontario Energy Board 2300 Yonge Street 27th Floor Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Early Determination regarding Billing of Cap and Trade Related Costs and Customer Re: Outreach (EB-2015-0363)

We are writing in response to Ontario Energy Board's Early Determination regarding Billing of Cap and Trade Related Costs and Customer Outreach dated July 28, 2016 on behalf of the Ontario Sustainable Energy Association (OSEA).

OSEA strongly disagrees with the Board's decision to include cap and trade costs within the delivery charge on customer bills. The Board's decision on this matter does not reflect the submissions from the vast majority of intervenors and utilities that advocated for transparency around carbon pricing and cap and trade program costs on customer bills.

In our submissions dated June 23, 2016, OSEA recommended a separate line item on customer bills, and noted that "this will permit customers to understand the implications of the cap and trade program on their natural gas bills. Awareness in combination with the customer outreach and education will help inform customers and encourage behavioural changes and the installation of abatement measures." OSEA's position remains the same.

OSEA supports the comments in the letter from the Industrial Gas Users Association (IGUA) dated August 15, 2016 and subsequent letters from other intervenors and utilities that requests that

- the Board provide reasons for its decision to include cap and trade costs in the delivery line item on customer gas bills, and
- provide further details regarding the information on cap and trade that the Board will require the utilities to include on monthly customer bills.



OSEA also urges the Board to re-consider its decision and to direct the utilities to include cap and trade program costs as a separate line item on natural gas bills.

Yours truly,

Joanna Vince

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