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September 6, 2016

Via RESS and Courier

Ms. Kirsten Walli  
Board Secretary  
**Ontario Energy Board**  
P.O. Box 2319  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
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Dear Ms. Walli:

**Re: EB-2015-0363: Cap and Trade Regulatory Framework for Natural Gas Utilities  
IGUA Letter dated August 15, 2016**

Aegent Energy Advisors is submitting this letter on behalf of the Ontario Association of Physical Plant Administrators (OAPPA). OAPPA is in receipt of the August 15<sup>th</sup> letter from the Industrial Gas Users Association (IGUA) and writes in support of IGUA's request for further information and reasons with respect to the Board's *Early Determination regarding Billing of Cap and Trade Related Costs and Customer Outreach*.

OAPPA was one of the numerous parties to support a separate line item on customers' bills for cap and trade compliance costs. As stated in its comments on the draft framework, in line with the transparency principle a separate line item on the bill facilitates customer understanding of cap and trade more effectively than a separate rate in a utility rate schedule since it will display the customer-specific dollar impact. Therefore, as others have indicated, OAPPA would also find it helpful if the Board were to provide further explanation as to why cap and trade compliance costs should be blended in with delivery charges and further detail on the information utilities will be required to include in the description section of bills.

Yours truly,



Valerie Young  
Director, Research and Analysis

cc. Paul Martin, OAPPA / Western University (e-mail)  
Laurie Klein, OEB Staff (e-mail)  
Rachele Levin, OEB Staff (e-mail)  
Interested Parties (e-mail)