



September 14, 2016

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

Dear Ms. Walli:

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

On March 10, 2016, the Ontario Energy Board (“OEB”) initiated a process to develop a natural gas regulatory framework to support the implementation of Ontario’s Cap and Trade Program. On May 25, OEB Staff released a Discussion Paper setting out a number of recommendations for the development of a Cap and Trade Framework. Stakeholders were given the opportunity to comment on the issues and proposals set out in the OEB Staff Discussion Paper.

On July 28, 2016, the OEB made an early determination regarding a number of issues related to customer billing and outreach. Among those was a decision that “charges related to the recovery of Cap and Trade Program costs will be included in the Delivery charge on the bill.” The OEB made this determination despite overwhelming support from stakeholder organizations represented in the process including the natural gas utilities to have Cap and Trade costs identified as a separate line item on the bill.

The Consumers Council of Canada (“Council”) supports the identification of Cap and Trade costs as a separate line item on the bill, because doing otherwise will be contrary to what the OEB has sought to accomplish in recent years – allowing for a better understanding of the bill, its components and the opportunities for suppliers, distributors and consumers to lessen impacts of energy consumption.

The Industrial Gas Users Association (“IGUA”) wrote to the OEB on August 15, 2016 seeking the following:

1. Further detail on the “information on cap and trade” which the Board has indicated the utilities will be required to include in the description section of monthly customer bills (as indicated in the 3rd paragraph of page 6 of the Determination); and

2. Reasons why blending cap and trade compliance costs in the current delivery charge line of gas customer bills is the better option for presentation to customers....

The Council supports the request for information. The Council also believes that the OEB should consult further about how the Cap and Trade Program should be explained to customers and what information should be provided to customers on the bill. From the Council's perspective, transparency is critical with respect to Cap and Trade.

Consumers should know the costs distributors will be authorized by the Board to pass to them individually each payment period resulting from the market in greenhouse gas emissions being created.

Yours truly,



Don Mercer
President

Cc: All Intervenors, EB-2015-0363