



15 September 2016

Ontario Energy Board  
P.O. Box 2319  
27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Attention: Board Secretary

EB-2016-0277

Dear Ms. Walli,

RE: License Amendment Request - Inspection LAS Electricity Retail License ER-2014-0280

Local Authority Services (LAS) is requesting an amendment to our existing electricity retail license ER-2014-0280 to include low volume consumers. The form of our request is contained in this letter and follows the information requested on the OEB website under "License Amendments". Sections of the application form are used where the information requested as part of the amendment requires updating.

**Amendment** – LAS is currently licensed as an electricity retailer for Large Volume Consumers under License ER-2014-0280 which is LAS's DCB (Distributor Consolidated Billing) License. LAS is requesting an expansion of the current license to include both Large and Low Volume Consumers.

**Amendment Reasons** - The Ontario Energy Board (OEB) recently completed an Inspection of Local Authority Services (LAS) electricity retail license ER-2014-0280 – License Name "Local Authority Services". The Inspection was completed by Ms. Birgit Armstrong – Advisor, Investigations for the OEB. The investigation determined that LAS was not authorized to retail to low volume consumers and that LAS should submit a request to amend our current license to include low volume consumers. Please see attached letter to Ms. Armstrong in response to her request for Inspection and Ms. Armstrong's determination of the Inspection.

LAS' request to amend the current license is to ensure LAS' licenses support our business activities and to ensure compliance with market requirements.

**No Hearing** – LAS requests the Board dispose of the proceeding for the request for license amendment without a hearing as provided for in section 21(4) (b) of the Ontario Board Act, 1998. In support of this request LAS submits:

- LAS is incorporated as a not-for-profit organization under the laws of Canada and is part of the Association of Municipalities of Ontario (AMO) family of companies.
- LAS' mandate is to provide programs and services to Ontario municipalities to help realize lower costs or higher revenues through co-operative procurement efforts and innovative programs and services.
- Municipalities as a group are generally quite aware of the nature of the market and how the services provided by LAS are delivered to aid the supply of electricity and the price protection we provide. Our marketing support material aligns with keeping municipal customers correctly informed and educating them where required.
- Municipalities trust LAS because of our focus on municipalities and because we are part of the AMO family. However, municipalities can and do choose the appropriate electricity retailer for their needs.
- LAS' request for license amendment does not restrict marketing activities of other competitive retailers to provide offers to the low volume municipalities class,
- LAS's presence in the low volume customer class provides options and choice to these type of municipalities.

LAS consents to disposal of this proceeding without a hearing if so determined by the Board.

The following updates are provided to ensure the Board has complete and up to date information for LAS:

- Contact name – Judy Dezell, Director AMO Enterprise Centre, Business Partnerships and LAS is the License Primary Contact and replaces Nancy Plumridge who is retiring at the end of September 2016. This information was previously submitted to the OEB and is included here for consistency,
- Application Primary Contact – will also be Judy Dezell – updated details are attached on the forms,
- Customer Complaint or Inquiries Primary Contact - will also be Judy Dezell – updated details are attached on the forms,
- Key Individuals – Pat Vanini, was listed as the Managing Director in the current license. Pat's title has changed to LAS, President,
- Key Individuals – Judy Dezell, Director AMO Enterprise Centre, Business Partnerships and LAS has been added as a key individual,
- Intended Services and Markets – for consistency with the request to amend the current license the Intended Services include selling or offer to sell of electricity to both low volume consumers and large volume consumers,

LAS understands the requirements and our obligations for retailing to low volume consumers under the Energy Consumer Protection Act, 2010. We have been provided an exemption as a 'broader public-sector procurement agent' under section 27 of Ontario Regulation 389/10. LAS realizes this exemption focusses only on a portion of the activities of retailing to low volumes consumers. LAS expects to meet all other requirements that are not exempt.

Our intent will be to provide transparency in our offers and work with existing and potential customers so they can make informed decisions that best suit their needs.

I trust we have correctly presented LAS's request to amend our license scope and have provided the required supporting information. However if any further information will aid the Board's review and decisions, please do not hesitate to contact me directly at 416.971.9856 Ext 306 or [jdezell@amo.on.ca](mailto:jdezell@amo.on.ca).

Sincerely,

A handwritten signature in black ink, reading "Judy Dezell". The signature is fluid and cursive, with the first name "Judy" and last name "Dezell" clearly distinguishable.

Judy Dezell  
Director AMO Enterprise Centre, Business Partnerships and LAS

Copy: Birgit Armstrong

Ontario Energy  
Board  
P.O. Box 2319  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto ON M4P 1E4  
Telephone: 1-888-632-6273  
Facsimile: (416) 440-7656

Commission de l'énergie  
l'Ontario  
C.P. 2319  
2300, rue Yonge  
27<sup>e</sup> étage  
Toronto ON M4P 1E4  
Téléphone: 1-888-632-6273  
Télécopieur: (416) 440-7656



## Application for an Electricity Retailer Licence

For Office Use Only	
Application Number	EB -
Date Received	

### 1. The Applicant

Legal Name of the Applicant : Local Authority Services

Name to Appear on Licence: Local Authority Services

☐ Indicate if the name to appear on the licence is the same as the legal name.

Please note that if the name to appear on the licence is not the same as the legal name, the name on the licence must include the legal name of the applicant and the legal name must appear first. The "Name to Appear on Licence" will appear on the notice of application and on the licence.

Business Classification:

☐ Sole Proprietor

☐ Partnership

☐ Corporation

☐ Other (describe) \_\_\_\_\_

Date of formation or incorporation: \_\_\_\_\_

Place of formation or incorporation: \_\_\_\_\_

Province/state \_\_\_\_\_

Country \_\_\_\_\_

If the applicant is an individual, the applicant must be at least 18 years old.

If the applicant is an individual, is he or she at least 18 years old?

☐ Yes

☐ No

☐ Not applicable - not an individual

## 2. Licence Primary Contact

As a condition of licensing, the licensee shall designate a person who will act as primary contact with the Board on matters related to the licence.

Mr. <input type="radio"/>	Mrs. <input type="radio"/>	Last Name	First Name	Initial
Miss <input type="radio"/>	Ms. <input checked="" type="radio"/>	Dezell	Judy	
Other <input type="radio"/>		Title/Position		
		Director AMO Enterprise Centre, Business Partnerships and LAS		
		Company Name if different from Name to Appear on Licence		

Licence Primary Contact Address:

200 University Avenue, Suite 801

City	Province/State	Country	Postal/Zip Code
Toronto	Ontario	Canada	M5H 3C6

Phone Number	Toll Free (if available)	Fax Number	E-mail Address
416-971-9856 ext. 306	877-426-6527	416-971-6191	jdezell@amo.on.ca

If the above address is not in Ontario, the applicant must also provide contact information for service purposes in the province of Ontario. Applicants whose offices are not located in Ontario may provide the address of an agent (an individual who is a resident of Ontario and is at least 18 years old, or a corporation that has its head office or registered office in Ontario) as the address of service.

Mr. <input type="radio"/>	Mrs. <input type="radio"/>	Last Name	First Name	Initial
Miss <input type="radio"/>	Ms. <input type="radio"/>			
Other <input type="radio"/>		Title/Position		
		Company Name if different from Name to Appear on Licence		

Address for Service in Ontario (if different than the Licence Primary Contact Address above)

City	Province	Postal Code
	ONTARIO	

Phone Number	Toll Free (if available)	Fax Number	E-mail Address

### 3. Application Primary Contact

☒ Indicate if same as above. If yes, proceed to section 4.

The primary contact for the licence application may be a person within the applicant's organization other than the licence primary contact noted above. An applicant may also choose to designate a consultant, lawyer, etc. to be the primary contact for the licence application. The Board will communicate with this person during the course of the application but with the licence primary contact after a licence is issued.

Mr. <input type="radio"/>	Mrs. <input type="radio"/>	Last Name	First Name	Initial
Miss <input type="radio"/>	Ms. <input type="radio"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Other <input type="radio"/>	<input type="text"/>	Title/Position	<input type="text"/>	
		Company Name if different from Name to Appear on Licence	<input type="text"/>	

Application Primary Contact Address:

City	Province/State	Country	Postal/Zip Code
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Phone Number	Toll Free (if available)	Fax Number	E-mail Address
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

### 4. Customer Complaint or Inquiries Primary Contact

Provide contact information of the person to whom correspondence or communication regarding customer complaints or inquiries should be addressed. The mailing address should be in Ontario and the telephone number should be listed in Ontario. If the applicant intends to retail electricity to low-volume consumers (annually consuming less than 150,000 kilowatt hours of electricity), the applicant should also provide a telephone number which may be reached by the general public without a charge.

Mr. <input type="radio"/>	Mrs. <input type="radio"/>	Last Name	First Name	Initial
Miss <input type="radio"/>	Ms. <input checked="" type="radio"/>	Dezell	Judy	<input type="text"/>
Other <input type="radio"/>	<input type="text"/>	Title/Position	<input type="text"/>	
		Director AMO Enterprise Centre, Business Partnerships and LAS		
		Company Name if different from Name to Appear on Licence	<input type="text"/>	

Customer Complaint or Inquiries Primary Contact Address:

200 University Avenue, Suite 801

City	Province	Postal Code
Toronto	ONTARIO	M5H 3C6

Phone Number	Toll Free	Fax Number	E-mail Address
416-971-9856 ext 324	877-426-6527	416-971-6191	jdezell@amo.on.ca

## 5. Type of Application

- ☐ New licence
- ☐ Renewal, please provide the licence number and expiry date of the existing licence

Licence Number: ER- \_\_\_\_\_ Expiry Date: \_\_\_\_\_

## 6. Trade Names

The electricity retailer licence authorizes the licensee to conduct business using the name under which the licence is held. It also provides for the use of trade names by the licensed electricity retailer.

Does the applicant intend to use trade names?

- ☐ Yes, provide a list of trade names the applicant intends to use in the space provided below.
- ☐ No, proceed to 7.


## 7. Applicant's Licensing Status and History

- (a) Has the applicant, an affiliate of the applicant, or an associated entity (e.g., a partnership or limited partnership) ever been licensed by the Ontario Energy Board? (the *Business Corporations Act* definition for affiliate can be found at [www.e-laws.gov.on.ca](http://www.e-laws.gov.on.ca)).

- ☐ Yes, provide details of current and expired licences in the table below.
- ☐ No, proceed to 7(b).

Licensor Name	Relation to the applicant (e.g., applicant itself, affiliate, partner...etc.)	Licence Number

- (b) Does the applicant, an affiliate of the applicant, or an associated entity (e.g., a partnership or limited partnership) have any other application(s) before the Ontario Energy Board?

☐ Yes, provide details in the table below.

☐ No, proceed to 7(c).

Applicant Name	Type of Application	Ontario Energy Board File Number (if applicable)

- (c) Has the applicant, an affiliate of the applicant, or an associated entity (e.g., a partnership or limited partnership) ever undertaken licensed energy sector activity in any other jurisdiction within North America?

☐ Yes, provide details of current and expired licences in the table below

☐ No

Company Name	Jurisdiction	Business Activity	Name of Licensing Body	Licence/Registration No.

## 8. Officers, Directors and Key Individuals

- (a) If the applicant is a corporation, provide as a separate attachment a list of all officers and directors, including name and title.

- (b) Provide a list of key individuals below. The individuals listed must be the individuals that are responsible for the following functions for the applicant: regulatory requirements and conduct, financial matters and technical matters. These key individuals may include the Chief Executive Officer, the Chief Financial Officer, other officers, directors and proprietors.

**Note: Please list a minimum of three key individuals. If unable to provide a minimum of three, please explain.**

Name of Key Individual	Title/position within applicant's business (or identify company if not the applicant's business)
Pat Vanini	President, LAS
Judy Dezell	Dir AMO Enterprise Centre,Business Partnerships & LAS



## 9. Intended Services and Markets

(a) Intended Services: please identify which of the following services the applicant intends to offer. You may select as many as applicable.

- ☒ to sell or offer to sell electricity to low-volume consumers (annually consuming less than 150,000 kilowatt hours of electricity) in Ontario.
- ☒ to sell or offer to sell electricity to large-volume consumers (annually consuming more than 150,000 kilowatt hours of electricity) in Ontario.
- ☐ to act as an agent or broker for a retailer with respect to the sale or offering for sale of electricity to large-volume consumers, or as an agent or broker for large-volume consumers with respect to the sale or offering for sale of electricity in Ontario.
- ☐ to act as an agent or broker for a retailer with respect to the sale or offering for sale of electricity to low-volume consumers, or as an agent or broker for low-volume consumers with respect to the sale or offering for sale of electricity in Ontario.

Is the applicant currently providing any of the above listed services?

- ☐ Yes, provide a list of the services the applicant is currently providing.

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- ☐ No, indicate when the applicant intends to provide these services.

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(b) Wholesale Market Participation: does the applicant intend to operate in the IESO-administered markets and settle bilateral contracts through the IESO?

- ☐ Yes
- ☐ No, please explain how the applicant intends to participate.

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(c) Retail Market Participation: does the applicant intend to settle the wholesale market cost of electricity consumed by its customers through a distributor's settlement system?

- ☐ Yes
- ☐ No, please explain how the applicant intends to participate.

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