

December 6th 2016

Sent by courier to:

Board Secretary Ontario Energy Board P.O.Box 2319 2300 Yonge Street, Suite 2700 Toronto, Ontario M4P 1E4

Dear Ms. Kirsten Walli,

Re: Comments for Issuance of Revised Proposed Consumer Facing Materials; EB-2015-0268

Attached to this letter, we kindly submit three (3) paper copies in response to the OEB's letter dated November 29th 2016, titled "Issuance of Revised Proposed Consumer Facing Materials; EB-2015-0268.

An electronic pdf copy of this letter has also been submitted through the OEB's web portal.

For further information, please feel free to contact me at the information below.

Sincerely,

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Imran Noorani Vice President Canadian RiteRate Energy Corporation (RiteRate) 20 Floral Parkway Concord, ON, L4K 4R1 Tel: 905.695.5247

Toll free: 1.877.866.8056 Fax: 1.866.323.9845

Email: inoorani@riterate.ca

Email cc: lou.mustillo@ontarioenergyboard.ca



In response to the Ontario Energy Board (OEB) letter dated November 29th, 2016, Canadian RiteRate Energy (RiteRate) is pleased to make the following submission. Our comments are as follows.

Online Versions:

The OEB has indicated that versions of the material will be reformatted for viewing online and ease of printing. RiteRate, as an online only retailer, believes that is imperative to be able to see these versions and provide comment on them as soon as possible. While we are very much in support of the new format as it is being presented, our interest in being able to view online versions expeditiously revolves around implementation considerations. This includes technical considerations related to dynamically generate price comparisons online, while also in being able to prepare our backend development team for changes for the January $1^{\rm st}$ 2017 date. While it may not seem apparent, simple considerations such as orientation of the document and data boxes to populate information into require lengthy programming and development time.

Since we do not employ our own development team in-house, we are very concerned that we will have issues meeting this timeline due to the holiday season and the schedule of our vendors. If the OEB is anticipating releasing online versions with the final documents, we strongly urge the OEB to consider a 1 month compliance transition in January 2017, providing previous formats of the price comparisons in the interim. We anticipate that we may be able to complete development work within 2 weeks, but need an additional 2 weeks for testing, given that the price comparison formats will be brand new and the increase in fines for non-compliance.

Revised Proposed Dual Fuel Disclosure Statement:

For comments please see:

• Appendix A: Comments Related to Revised Proposed Dual Fuel Disclosure Statement

Revised Proposed Price Comparisons Templates:

For comments please see:

- Appendix B: Comments Related to Revised Proposed Natural Gas Price Comparison Template for Non-residential Consumers
- Appendix C: Comments Related to Revised Proposed Natural Gas Price Comparison Template for Residential Consumers
- Appendix D: Comments Related to Revised Proposed Electricity Price Comparison Template for Residential
- Appendix E: Comments Related to Revised Proposed Electricity Price Comparison Template for Non-residential Consumers

General Comments:

While we appreciate the effort required to rollout such a detailed endeavour in such a short timeframe, we are concerned that the OEB is not fully considering impacts to our business model in this consultation. We understand that our model is unique and is not representative of the collective sector, but OEB expressions in this consultation related to verification and to revised proposed documents is providing us no option but to shut down our business.

Specifically, requirements that verification be conducted via telephone, when we have never had to, requires us to build a redundant system, only to be replaced by another online verification system in the near future. The cost of both these systems will price us out of the market. The OEB consultations provides no resolve nor consideration for this issue. Furthermore, the OEB letter dated November 29^{th} 2016 provides materials for in person sign ups, but does not provide online versions. This suggests that the OEB does not see the importance of a retailer/marketer in being able to see these online documents, yet this is extremely important to us to meet our compliance obligations for January 1^{st} 2017 and we can't begin development work without these.

These impacts may be an unintended consequence but we urge the OEB to consider how dire these changes are on our business and to not view this consultation with a 'one size fits all' lens with all retailers and marketers being the same.

Important Information About Electricity And Natural Gas Contracts

Before You Sign Up, Know The Facts.

We're Here to Help

Contact us if you have questions or concerns:

Ontario Energy Board Consumer Relations

Hours: 8:30 a.m. - 5 p.m., Monday to Friday

In Toronto: 416-314-2455 Toll Free: 1-877-632-2727

TTY: 1-844-621-9977 (toll-free within Ontario)
ConsumerRelations@OntarioEnergyBoard.ca

Acknowledgement

I have received this Disclosure Statement as required by law. This Disclosure Statement is not part of the contract.

Sign and keep this document for your records.

Signature

Date

This document is also available at OntarioEnergyBoard.ca in the following languages:

- · Arabic · Farsi · Hindi · Italian · Somali
- · Portuguese · Punjabi · Chinese · Spanish
- · Vietnamese · Tamil · Urdu

Ce document est aussi disponible en français.



@OntEnergyBoard

OntarioEnergyBoard.ca



DISCLOSURE STATEMENT



Important Information About Electricity And Natural Gas Contracts

Before You Sign Up, Understand:

- 1. The Price
- 2. Your Rights
- 3. Your Responsibilities

Optional Retailer Document Control no. [field]

Rev.: [field]

Valid from January 1, 2017

The Ontario **Energy Board**

PROTECTING YOU

The Ontario Energy Board (OEB) is the independent regulator protecting Ontario's electricity and natural gas consumers.

This information was prepared by the OEB. Please read it carefully.

The Facts



You Do Not Have To Enter Into A Contract.

- · You have a choice: You may decide to enter into an energy contract or you can purchase electricity or natural gas from your utility. Energy contract prices are not regulated by the OEB.
- Your home will have natural gas or electricity whether or not you sign a contract.
- · With, or without, an energy contract, you will still be eligible for conservation and other programs from government or your utility.



Savings Are Not Guarenteed.

· The OEB does not set prices included in the energy retailer's contract. Make sure you understand what you will pay under the contract.



Energy Retailers Are Not Your Utility, The Government or The OEB.



Use The OEB's Online Bill **Calculator To Compare Prices**

Before you enter into a contract, get a current price comparison. Use your own utility bill, the contract price offer and the OEB's bill calculator.

Go to OntarioEnergyBoard.ca

Before You Sign Up WHAT YOU NEED TO KNOW



Do your homework. Don't be pressured.

The energy retailer must give you the following documents. Take the time to read all the information.

- · The Energy Contract
- · A Price Comparison, one for electricity and one for natural gas

f these documents were not provided to you, call the OEB.



Understand Payment Options.

· If you are on an equal payment plan, make sure you ask your electricity utility if you can stay on their plan if you enter into a contract.



You Can

Change

Your Mind

Remember, You Are Entering Into A Legal Agreement.

> You can cancel the contract with no penalty:

- Within 10 days of signing up for the contract.
- Within 30 days after you receive your second bill under the contract. You will still have to pay your bill.
- · You can cancel at any other time but may have to pay a cancellation fee. Read

There will be other charges.

An energy contract only applies to part of

- · If you switch to an energy retailer, you still have to pay other charges to your utility companies to have your natural gas and electricity delivered to your home.
- The Global Adjustment (GA) accounts for the differences between the market price of electricity and the rates paid to regulated and contracted generators, and for conservation programs.
- All electricity customers pay a portion of the GA. Under an electricity contract, you will start to see that the GA is itemized as a separate line on your bill.

The contract is a legal agreement between you and an energy retailer. When you sign, you have rights and you also have responsibilities.

cancellation rules and cost. Confirming the contract

your contract and know the

 You will be contacted 10-45 days after you've entered into the contract to verify that you wish to continue with it. If you do not want to continue with the contract, you can say so. You will not have to pay a cancellation fee.

Suggested: "The OEB does not set supply prices included in the energy retailer's contract".

Suggested: "All electricity customers pay a portion of the GA. Under an electricity contract, you will still pay the GA, but will start to see that the GA is itemized as a separate line on your bill."

Natural Gas Price Comparison

Before You Sign Up, Compare Prices

NATURAL GAS | NON-RESIDENTIAL Natural Gas Price Comparison

Still Have Questions?

Contact the energy retailer that gave you this sheet or the Ontario Energy Board.

Ontario Energy Board Consumer Relations

Hours: 8:30 a.m. – 5 p.m., Monday to Friday

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@OntEnergyBoard

OntarioEnergyBoard.ca

Acknowledgement

I have received this Price Comparison Sheet as required by law.

Signature

This Price Comparison Sheet is not part of the contract. Sign and keep it for your files.

Before You Sign Up, Compare Prices

Optional Retailer Document Control no. [field] Rev.: [field]

Valid from January 1, 2017 to March 31, 2017

Understanding the Price Comparison

This Price Comparison compares only the price businesses pay for the natural gas commodity bought from ABC Utility (Table A) to the price offered by the energy retailer (Table B). This is not a total bill comparison.

These prices are affected by the can change every three months. Even if you switch to an energy of the price of

Table A and all other information was prepared by the Ontario Energy Board (OEB). Table B and the description of the contract price offer on this Price Comparison was filled in by the energy retailer.

Table A shows the prices set by the OEB charged by ABC utility. These prices are affected by the market cost of natural gas and can change every three months.

Even if you switch to an energy retailer, you will still have to pay other charges to have your natural gas delivered to your business by ABC utility. These charges may include Delivery, Storage and Customer charges as well as taxes. Table B shows you whether Transportation is a separate charge or is included.

Table A and B compare prices for three different levels of monthly natural gas use. However, the amount of natural gas your business uses may be different. Check your bill and select the level that is closest to the amount your business uses.

The contract price offered by the energy retailer in Table B is not regulated by the OEB.

ABLE Prices from ABC Utility:
These prices are set by the OEB

Natural Gas Usage	350 m³	2,200 m³	4,000 m³	
Natural Gas Supply Price: 13.1238 ¢ / m³	\$45.93	\$288.72	\$524.95	
Transportation Price: 6.4714 ¢ / m³	\$22.65	\$142.37	\$258.86	
*Estimated Monthly Amount	\$68.58	\$431.09	\$783.81	

^{*}You will also have to pay charges to your utility including Delivery and Customer charges as well as taxes.



Learn more at OntarioEnergyBoard.ca

The way this table is presented, it suggests the marketer will always have additional charges. If there are no additional charges (such as administration), then the marketer should be given the option to collapse the unnecessary row.

Natural Gas Prices offered under contract by:

[field]

This price is not regulated by the OEB

Natural Gas Usage	350 m³	2,200 m³	4,000 m³
Natural Gas Supply Price: [field] ¢ / m³	[field]	[field]	[field]
Transportation Price: [field] ¢ / m³	[field]	[field]	[field]
[field]	[field]	[field]	[field]
*Estimated Monthly Amount	[field]	[field]	[field]

You will also have to pay charges to your utility including Delivery and Customer charges as well as taxes.

Description of Contract Price Offer

The Natural Gas Contract Price information below and in Table B above has been prepared by: [company name field] It has not been reviewed or approved by the OEB.

[description field]

Where prices are variable, the marketers is required to provide a price forecast for 6 months. This space may not be adequate to do that in addition to descriptions.

Suggested: "These prices are set by the OEB. They can change every three months".

Comment: One of the concerns is not being able to adequately compare variable versus fixed. We suggest the above statement can help in creating clarity.

We recommend removing this statement. It's positioning here next to the name of the marketer could be interpreted as the marketer is conducting an illegal activity since the price comparison hasn't been "reviewed or approved" by the OEB. It could be interpreted as implying that the OEB has a responsibility to do that before the customer receives it.

Appendix C: Comments Related to Revised Proposed Natural Gas Price Comparison Template for Residential Consumers

Natural Gas Price Comparison

Before You Sign Up, Compare Prices

NATURAL GAS | RESIDENTIAL Natural Gas Price Comparison

Still Have Questions?

Contact the energy retailer that gave you this sheet or the Ontario Energy Board.

Ontario Energy Board Consumer Relations

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ConsumerRelations@OntarioEnergyBoard.ca

@OntEnergyBoard

OntarioEnergyBoard.ca

Acknowledgement

I have received this Price Comparison Sheet as required by law.

Signature	
Date	

This Price Comparison Sheet is not part of the contract. Sign and keep it for your files.

Before You Sign Up, Compare Prices

Optional Retailer Document Control no. [field] Rev.: [field]

Valid from January 1, 2017 to March 31, 2017

Understanding the Price Comparison

This Price Comparison compares only the price consumers pay for the natural gas commodity bought from ABC Utility (Table A) to the price offered by the energy retailer (Table B). This is not a total bill comparison

The information in Table A and on this page was prepared by the Ontario Energy Board (OEB), Table B and other information was prepared by the energy retailer.

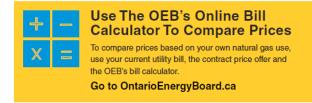


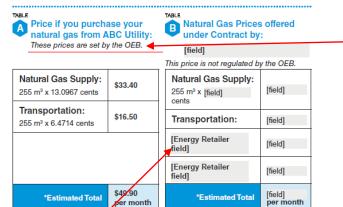
Table A shows the prices set by the Ontario Energy Board (OEB) and charged by ABC Utility. These prices are affected by the market price of natural gas and can change every three months.

Even if you switch to an energy retailer, you will still have to pay other charges to have your natural gas delivered to your home by ABC Utility.

These charges include Delivery, Storage and Customer charges as well as taxes. Table B shows you whether Transportation is a separate charge or is included in the contract price being offered.

The way this table is presented, it suggests the marketer will always have additional charges. If there are no additional charges (such as administration), then the marketer should be given the option to collapse the unnecessary row.

The energy usage shown represents the typical household's natural gas usage for one month. Your actual monthly natural gas use may be different.



*You will also have to pay charges to your utility including Delivery and Customer charges as well as taxes

Description of Contract Price Offer

The Natural Gas Contract Price information below and in Table B above has been prepared by: [company name field]

It has not been reviewed or approved by the OEB.

[description field]

Where prices are variable, the marketers is required to provide a price forecast for 6 months. This space may not be adequate to do that in addition to descriptions.

Suggested: "These prices are set by the OEB. They can change every three months".

Comment: One of the concerns is not being able to adequately compare variable versus fixed. We suggest the above statement can help in

We recommend removing this statement. It's positioning here next to the name of the marketer could be interpreted as the marketer is conducting an illegal activity since the price comparison hasn't been "reviewed or approved" by the OEB. It could be interpreted as implying that the OEB has a responsibility to do that before the customer receives it.

Appendix D: Comments Related to Revised Proposed Electricity Price Comparison Template for Residential Consumers

Electricity Price Comparison

Before You Sign Up, Compare Prices

Still Have Questions?

Contact the energy retailer that gave you this sheet or the Ontario Energy Board.

Ontario Energy Board Consumer Relations

Hours: 8:30 a.m. - 5 p.m., Monday to Friday

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TTY: 1-844-621-9977 (toll-free within Ontario) ConsumerRelations@OntarioEnergyBoard.ca





Acknowledgement

I have received this Price Comparison Sheet as required by law. Signature

This Price Comparison Sheet is not part of the contract. Sign and keep it for your files.

ELECTRICITY | RESIDENTIAL



Electricity Price Comparison

Before You Sign Up, Compare Prices

Optional Retailer Document Control no. [field]

Roy - [field]

Valid from November 1, 2016 to April 30, 2017

Understanding the Price Comparison

This Price Comparison compares only the price consumers pay on the Electricity line of the bill from their utility (Table A) to the price of electricity offered by the energy retailer (Table B). This is not a total bill comparison.

The information on this page and in Table A was prepared by the Ontario Energy Board (OEB), Table B and other information in this Price Comparison was prepared by the

Table A shows the prices that are billed by your utility based on time-of-use prices as set by the OEB. These prices can change every May and November.



Use the OEB's Online Bill Calculator To Compare Prices.

To compare your total bill costs based on your own electricity use, use your current utility bill, the contract price offer and the OEB's bill calculator.

Learn more at OntarioEnergyBoard.ca

Here are key things you need to know:

1. Other Charges

Even if you switch to an energy retailer, you will still have to pay other charges each month to have your electricity delivered to your home by your utility.

These charges include Delivery and Regulatory charges as well as taxes.

2. The Global Adjustment (GA)

The GA accounts for the differences between the market price of electricity and the rates paid to regulated and contracted generators, and for conservation programs.

All electricity consumers pay a portion of the GA. The electricity prices offered by your utility include an estimate of the GA. If you switch to an energy retailer, you will

Before Comparing Prices still have to pay your share of the GA and it will appear as a separate line item on your electricity bill. The GA is calculated, and can change, each month. Learn more about the GA at OntarioEnergyBoard.ca

3. Time-of-Use Pricing

Under time-of-use pricing, the amount you pay for electricity depends on when you

A typical household uses roughly:

- · 65% (or 487.5 kWh) during Off-Peak hours when prices are lowest
- · 17% (or 127.5 kWh) during Mid Peak hours when prices are higher
- 18% (or 135.0 kWh) during On-Peak hours when prices are highest

These patterns are reflected in the Price Comparison in Table A on the right.

It would provide clarity to show a dollar value of the global adjustment (bolded). This would allow a consumer to compare and see that they will still continue to pay the same global adjustment amount which is a concern/comment we regularly receive from customers.

"Estimated amount of \$ 68.18 included in the above prices as described on the left"

The table assumes the typical Ontario household's electricity use: 750 kWh per month. Your actual monthly electricity use may be different.

TABLE **Electricity Line Price From** Your Utility

Electricity Line Contract Price offered by:

This is calculated using prices set by the OEB. 750 kWh @ [field] 750kWh based on \$83,54 typical time-of-use cents /kWh consumption pattern [Energy Retailer field] [field] [Energy Retailer field] field] [Energy Retailer field] [field] Global Adjustment: Global Adjustment: Estimated amount included in 750 kWh x [field] above prices as cents estimated [field] described on the (actual monthly an ount may vary) \$83.54 *Estimated Electricity [field]

*You will also have to pay charges to your utility including Delivery and Regulatory charges as well as taxes.

Description of Contract Price Offer

per month

The Electricity Line Contract Price information below and in Table B above has been prepared by: [company name field] It has not been reviewed or approved by the OEB.

[description field]

The way this table is presented, it suggests the retailer will always have additional charges and can be confusing when trying to visually compare. If there aren't 2 or 3 additional charges, then the retailer should be given the option to collapse the unnecessary rows.

Suggested: "This is calculated using prices set by the OEB. They can change every six months".

Comment: One of the concerns is not being able to adequately compare. We suggest the above statement can help in creating clarity.

We recommend removing this statement. It's positioning here next to the name of the marketer could be interpreted as the marketer is conducting an illegal activity since the price comparison hasn't been "reviewed or approved" by the OEB. It could be interpreted as implying that the OEB has a responsibility to do that before the customer receives it.

Electricity Price Comparison

Before You Sign Up, Compare Prices

Still Have Questions?

Contact the energy retailer that gave you this sheet or the Ontario Energy Board.

Ontario Energy Board Consumer Relations

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OntarioEnergyBoard.ca

Acknowledgement

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Signature

Date

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ELECTRICITY | NON-RESIDENTIAL



Electricity Price Comparison

Before You Sign Up, Compare Prices

Optional Retailer Document Control no. [field]

Rev.: [field]

Valid from Nov 1, 2016 to April 30, 2017

Understanding the Price Comparison

This Price Comparison compares only the price businesses pay on the Electricity line of the bill from their local utility (Table A) to the price of electricity offered by the energy retailer (Table B). This is not a total bill comparison

The information on this page and in Table A was prepared by the Ontario Energy Board (OEB). Table B and other information on this price comparison was filled in by the energy retailer.

Table A shows the prices that are billed by your utility based on time-of-use prices as set by the OEB. These prices can change every May and November.



Use The OEB's Online Bill Calculator To Compare Prices To compare your total bill costs based on your own electricity use, use your

current utility bill, the contract price offer and the OEB's bill calculator. Learn more at OntarioEnergyBoard.ca

Here are key things you need to

1. Other Charges

Even if you switch to an energy retailer, you will still have to pay other charges each month to have your electricity delivered to your business by your utility.

These charges include delivery and regulatory · 65% during Off-Peak hours when prices charges as well as taxes.

2. The Global Adjustment (GA)

All electricity consumers pay a portion of the GA. The electricity prices offered by your utility include an estimate of the GA. If you switch to an energy retailer, you will still have to pay your share of the GA and it will appear as a separate line item on your electricity

Before Comparing Prices bill. The GA is calculated, and can change, each month. Learn more about the GA at OntarioEnergyBoard.ca

3. Time-of-Use Pricing

Under time-of-use pricing, the amount your business pays for electricity depends on when you use it.

Table A shows time-of-use pricing for a business with the following monthly electricity use pattern:

- · 17% during Mid-Peak hours when prices
- 18% during On-Peak hours when prices

It would provide clarity to show dollar values of the respective global adjustment (bolded). This would allow a consumer to compare and see that they will still continue to pay the same global adjustment amount which is a concern/comment we regularly receive from customers. It would be helpful to add three columns below the global adjustment description.

"Estimated amounts included in the above prices are outlined below and described on the left.

	\$90.90	\$590.85	\$1,090.80
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. Tables A and B below compare prices for three different levels of monthly electricity use. The amount of electricity that your business uses may be different. Check your bill and select the kWh level that is closest to what your business uses each month.

Electricity Line Price From Your Utility

Electricity Line Contract Price Offered By:

This is calculated using prices set by the OEB and the typical time-of-use consumption pattern described on the left

cents per kWh Based on [field] These prices are not regulated by the OEB

1,000 kWh	6,500 kWh	12,000 kWh	1,000 kWh	6,500 kWh	12,000 kWh	
\$111.39	\$724.04	\$1,336.68	[field]	[field]	[field]	
*******			[Energy Retailer field]			
			[field]	[field]	[field]	
		[Energy Retailer field]				
			[field]	field]	[field]	
Global Adjustment:			Global Adjustment:			
Estimated amount included in above prices as described on the left				Monthly kWh X [field] cents estimated (actual monthly amount may vary)		
X			[field]	[field]	[field]	
*Estimated Electricity Line Monthly Total			*Estimated Electricity Line Monthly Total			
\$111.39	\$724.04	\$1,336.68	[field]	[field]	[field]	

*You will also have to pay charges to your utility including Delivery and Regulatory charges as well as taxes

Description of Contract Price Offer

The Electricity Line Contract Price information below and in Table B above has been prepared by: [company name field] . It has not been reviewed or approved by the OEB.

[description field]

The way this table is presented, it suggests the retailer will always have additional charges and can be confusing when trying to visually compare. If there aren't 2 or 3 additional charges, then the retailer should be given the option to collapse the unnecessary rows.

Suggested: "This is calculated using prices set by the OEB and the typical time-of-use consumption pattern described on the left. Prices set by the OEB can change every six months".

Comment: One of the concerns is not being able to adequately compare. We suggest the above statement can help in creating clarity.

We recommend removing this statement. It's positioning here next to the name of the retailer could be interpreted as the retailer is conducting an illegal activity since the price comparison hasn't been "reviewed or approved" by the OEB. It could be interpreted as implying that the OEB has a responsibility to do that before the customer receives it.