

April 30, 2018

Via Courier

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

RE: Just Energy Ontario L.P. ("Just Energy") Natural Gas Marketer and Electricity Retailer Annual Self-Certification Statement; EB-2012-0089

Dear Ms. Walli:

Please find enclosed Just Energy's Annual Self-Certification Statement for its Natural Gas Marketer Licence GM-2015-0119 and Electricity Retailer Licence ER-2015-0118 pursuant to section 6.4 of the Natural Gas Marketer and Electricity Retailer Code of Conduct.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Lucia Arrazola

Regulatory Affairs Specialist Tel: 905.670.4440 Ext 71479

Fax: 1866.299.3749 larrazola@justenergy.com

**Enclosures: Annual Self-Certification Statements** 















**Print Form** 

## Form of Self-Certification Statement on Compliance Under Section 6.4 of the Code of Conduct for Gas Marketers

Note: This form is required to be used for the purposes of compliance with section 6.4 of the Board's Code of Conduct for Gas Marketers pertaining to the annual filing of a Self-certification Statement on compliance with all applicable legal and regulatory requirements (as defined below). The form should be completed in accordance with the Ontario Energy Board's instructions as set out on the Board's webpage.

Gas marketers must maintain and be able to provide, on request, records substantiating the statements made in this Self-certification Statement.

## Part I: Definitions and Interpretation

## 1.1 In this Self-certification Statement:

"applicable legal and regulatory requirement" means any requirement under the *Energy Consumer Protection Act, 2010*, the *Ontario Energy Board Act, 1998*, the regulations made under those Acts, a licence issued under section 48 of the *Ontario Energy Board Act, 1998* and any rule made by the Board under section 44 of the *Ontario Energy Board Act, 1998* that is in force on the Effective Certification Date;

"Effective Certification Date" means the date on which this Selfcertification Statement is signed by the Gas Marketer and filed with the Board:

"low volume consumer" means a person who annually uses less than 50,000 cubic metres of gas or such other amount as may be prescribed for the purposes of section 2 of the *Energy Consumer Protection Act*, 2010:

"Gas Marketer" means the licensed gas marketer identified in the opening paragraph of section II;

"salesperson" has the meaning given to it in section 2 of the *Energy Consumer Protection Act, 2010*, and for greater certainty includes any person that offers or negotiates the renewal or extension of a contract on behalf of a gas marketer but excludes a verification representative when acting solely in that capacity;

"text-based" has the meaning given to it in the *Energy Consumer Protection Act, 2010*; and

"verification representative" means a person that conducts the verification of a contract on behalf of a gas marketer.

- 1.2 Unless otherwise defined in this Self-certification Statement, words and phrases shall have the meanings given to them in the *Ontario Energy Board Act, 1998*, the *Energy Consumer Protection Act, 2010* or the regulations made under those Acts.
- 1.3 In this Self-certification Statement, "N/A" in relation to a given statement means that the Gas Marketer will not, as of the Effective Certification Date and for a period of not less than 1 month thereafter, carry on the activity to which the statement relates.
- 1.4 All statements in this Self-certification Statement pertain to marketing to low volume consumers.

Part II:

Retail Stores

Self-certification

Patrick McCullough; Chief Executive Officer; Just Energy Ontario L.P.

having made all necessary enquiries, certify on behalf of the Gas Marketer that:			
Confirmation of Marketing Activities			
The channels that the Gas Marketer is using for the purpose of marketing gas as of the Effective Certification Date are the following: -	Yes	No	
1. In-Person Channels	~		
(a) Door-to-Door	~		
(b) Exhibitions			
(c) Trade shows	~		
(d) Gas Marketer's place of business	~		
(e) Other (please specify below)	V		

	Yes	No
2. Direct Mail	~	
3. Internet	V	
4. Telephone Renewals	V	
5. Other (please specify below)	V	
Radio, Online advertising, and Business Partnerships		
Self-certification Statement	•	<del></del>
1. Salespersons	Yes	N/A
(A) All salespersons acting on behalf of the Retailer have undergone training and testing in accordance with all applicable legal and regulatory requirements	V	
(B) Each salesperson acting on behalf of the Retailer has been provided with business cards that meet all applicable legal and regulatory requirements	~	
(C) Each salesperson acting on behalf of the Retailer has been provided with an identification badge that meets all applicable legal and regulatory requirements	~	
(D)The Retailer's practices for hiring or contracting for salespersons are such that on and after the Effective Certification Date, those persons can be expected to conduct their activities in compliance with all applicable legal and regulatory requirements and with integrity and honesty.	>	
(E) Adequate processes and controls, designed to ensure that the conduct of salespersons on and after the Effective Certification Date is in accordance with all applicable legal and regulatory requirements, are in place	V	

Self-certification Statement		
2. Sales using a text-based contract	Yes	N/A
(A) All contract offers, contracts and promotional material pertaining to the sale of electricity to consumers have been prepared or revised as required to comply with all applicable legal and regulatory requirements and only offers, contracts and promotional material that so comply will be used on and after the Effective Certification Date	V	
(B) The required disclosure statement and price comparison will be used on and after the Effective Certification Date in accordance with all applicable legal and regulatory requirements	Y	
(C) Adequate processes and controls, designed to ensure that the text- based contracting process on and after the Effective Certification Date is conducted in accordance with all applicable legal and regulatory requirements, are in place	V	
3. Sales using the Internet	Yes	N/A
(A) The Retailer's internet website and internet contracting process comply with all applicable legal and regulatory requirements	~	
(B) All contract offers, contracts and promotional material pertaining to the sale of electricity to consumers comply with all applicable legal and regulatory requirements and only offers, contracts and promotional material that so comply will be used on and after the Effective Certification Date	~	
(C) The required disclosure statement and price comparison will be used on and after the Effective Certification Date in accordance with all applicable legal and regulatory requirements	1	
(D) Adequate processes and controls, designed to ensure that the internet contracting process on and after the Effective Certification Date is conducted in accordance with all applicable legal and regulatory requirements, are in place	>	
4. Verification	Yes	N/A
(A) No verification representative acting on behalf of the Retailer will be remunerated on and after the Effective Certification Date in a manner contrary to any applicable legal and regulatory requirements	<b>\</b>	
(B) All verification representatives acting on behalf of the Retailer have undergone training and testing in accordance with all applicable legal and regulatory requirements	~	
(C) All verification representatives acting on behalf of the Retailer have been instructed to do so using the verification call script approved by the Board	<b>'</b>	
(D) Adequate processes and controls, designed to ensure that each verification call made or received by the Retailer on and after the Effective Certification Date (including a call from a consumer for the		

Self-certification Statement		
purpose of giving notice not to verify) is recorded and that a copy of the call recording can be retrieved and provided to the consumer upon request in accordance with all applicable legal and regulatory requirements, are in place		
(E) Adequate processes and controls, designed to ensure that the verification of electricity contracts with consumers on and after the Effective Certification Date is conducted in accordance with all applicable legal and regulatory requirements, are in place	V	
5. Contract Renewals and Extensions	Yes	N/A
(A) All contract renewal/extension offers, contract renewal/extension forms and promotional material pertaining to the renewal/extension of electricity contracts with consumers comply with all applicable legal and regulatory requirements and only contract renewal/extension offers, renewal/extension forms and promotional material that so comply will be used	\	
(B) The required disclosure statement and price comparison will be used on and after the Effective Certification Date in accordance with all applicable legal and regulatory requirements	~	
(C) All salespersons conducting telephone renewals on behalf of the Retailer have undergone training and testing in accordance with all applicable legal and regulatory requirements	<b>V</b>	
(D) All salespersons conducting renewal calls on behalf of the Retailer have been instructed to do so using the renewal call script approved by the Board	>	
(E) Adequate processes and controls, designed to ensure that each renewal/extension call made or received by the Retailer on and after the Effective Certification Date (including a call from a consumer for the purpose of giving notice not to renew/extend) is recorded and that a copy of the call recording can be retrieved and provided to the consumer upon request in accordance with all applicable legal and regulatory requirements, are in place	>	
(F) Adequate processes and controls, designed to ensure that the renewal/extension of electricity contracts with consumers on and after the Effective Certification Date is conducted in accordance with all applicable legal and regulatory requirements, are in place	V	
6. Contract Amendments	Yes	N/A
(A) Adequate processes and controls, designed to ensure that the amendment of any electricity contract with a consumer on and after the Effective Certification Date is conducted in accordance with all applicable legal and regulatory requirements, are in place	~	

Self-certification Statement				
7. Cancellations and Retractions		Yes	N/A	
(A) Adequate processes and controls, designed cancellation of any contract with a consum Certification Date is processed in accordary and regulatory requirements, including as to which the consumer may by law be enti- the consumer back to the consumer's utilit	ner on and after the Effective ince with all applicable legal to the payment of any refund tiled and to the switching of by, are in place	<b>\</b>		
(B) Adequate processes and controls, designed of the renewal/extension of any gas control the Effective Certification Date is processed applicable legal and regulatory requirement switching of the consumer back to the con-	nct by a consumer on and after ad in accordance with all ats, including as to the	<b>\</b>		
(C) Adequate processes and controls, designed to ensure that each cancellation call and each retraction call received by the Gas Marketer on and after the Effective Certification Date is recorded and that a copy of the call recording can be retrieved and provided to the consumer upon request in accordance with all applicable legal and regulatory requirements, are in place		<b>\</b>		
8. Complaint Handling		Yes	N/A	
(A) Adequate processes and controls are in place to ensure that consumer complaints on and after the Effective Certification Date alleging non-compliance with any applicable legal or regulatory requirement can be received and are reviewed by the Gas Marketer in a timely manner		<b>V</b>		
(B) Adequate processes and controls are in plaction is taken in a timely manner to addressered to in (A) above, with the consumer is the subject of the complaint	ss consumer complaints	<b>7</b>		
Date: April 30, 2018				
Set	Patrick McCullough; Chief Execution	ve Offic	er;Just-	
Signature	Title			

## Notes:

- 1. This Self-certification Statement must be signed by the Gas Marketer's Chief Executive Officer, Chief Operating Officer, President or other person of equivalent position.
- It is an offence under section 128(1)(b) of the Onlario Energy Board Act, 1998 to knowingly furnish
  false or misleading information in any application, statement or return made under that Act or in
  any circumstances where information is required or authorized to be provided under that Act.

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