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July 24, 2018

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

Dear Ms. Walli:

**Re: Carma Industries Inc.
Application for Unit Sub-Metering Licence
OEB File Number EB-2018-0208**

In accordance with the Notice of Application and Written Hearing, please find enclosed OEB staff's Interrogatories filed in the above mentioned proceeding.

Yours truly,

Original signed by

Irina Kuznetsova
Case Manager

Attachment

OEB Staff Interrogatories

Carma Industries Inc.

(Carma)

Unit Sub-metering Licence Renewal Application

EB-2018-0208

July 24, 2018

1. Ref: Section 4 – Trade Names and Section 8 - Corporate Organization

In section 4, Carma requested Carma Billing Services Inc. and Carma Meter Services Inc. to be included in the licence as the trade names¹. However, according to Carma's corporate organization chart and financial statements filed in support of the application, it appears that Carma Billing Services Inc. is a separate legal entity that is engaged in customer service and billing, i.e. unit sub-metering activities which cannot be performed unless licensed, pursuant to section 57 (c.1).

- a. Describe all business activities carried out by Carma Industries Inc., Carma Billing Services Inc. and Carma Meter Services Inc.
- b. If Carma Billing Services and Carma Meter Services are registered trade names, provide the appropriate trade name registrations.
- c. Amend your application, if applicable, to reflect a proper legal name of the entity providing unit sub-metering services, e.g. Carma Billing Services Inc. If necessary, file additional application(s) to ensure that all legal entities (despite their affiliation with Carma Industries Inc.) that are engaged in unit sub-metering activities are licensed by the OEB as required by section 57 (c.1) of the OEB Act.

2. Ref: Section 10– Technical Resources

In the application, Carma stated that it employs 12 field technicians for the installation, maintenance, repair and re-verification of unit sub-meters. However, in section 7- Intended Services, Carma stated that in addition to manufacturing, installation and maintenance of unit sub-meters, it provides billing, collection and call centre activities.

- a. Describe qualifications and experience of Carma's personnel responsible for billing, collection and call centre activities.

¹ A **trade name** or **business name** is a pseudonym used by companies to operate under a name different from their registered **legal name**. An incorporated company has to register an operating trade name, which would allow the company to carry on business under a name other than its legal corporate name.

3. Compliance with Unit Sub-metering Code (Code)

As a condition of its licence, Carma has to comply with provisions of the Unit Sub-metering Code.

- a. As per section 2.3.1 of the Code, metering data collected by a unit sub-meter provider shall be subjected to a validating, estimating and editing (VEE) process if it is to be used for billing purposes. As per section 2.3.4 of the Code, a unit sub-metering provider shall document and make available its VEE process and criteria, and allow scrutiny of its process by consumers, retailers, the OEB and Measurement Canada.
 - i. Describe what processes and procedures are in place or would be put in place by Carma to ensure that correct and validated data is used for the billing process.
 - ii. Describe how Carma ensures that errors resulted from potential hardware/software malfunctions are detected and fixed before issuance of the invoices to the customers.
- b. As per section 3.3.3 of the Code, if any consumer makes a complaint to a unit sub-meter provider regarding its services, the unit sub-meter provider shall expeditiously investigate the complaint and take all appropriate and necessary steps to resolve the complaint.
 - i. Describe how Carma intends to ensure compliance with its legal and regulatory obligations in Ontario. In your response, describe the staff, policies, processes and procedures in place or to be put in place to ensure compliance.
 - ii. Provide the names and titles of all individuals that are or will be accountable for compliance, complaint handling and quality assurance, and describe fully their expertise in each applicable area.