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August 21, 2018

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

Dear Ms. Walli:

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

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

Yours truly,

Original signed by

Irina Kuznetsova
Case Manager

Attachment

OEB Staff Submission

CARMA Billing Services Inc.

Unit Sub-metering Licence Application

EB-2018-0208

August 21, 2018

THE PROCEEDING

On June 18, 2018, CARMA Billing Services Inc. (Carma) filed an application with the Ontario Energy Board (OEB) under section 60 of the *Ontario Energy Board Act, 1998* (OEB Act) for a unit sub-metering licence renewal.

On June 28, 2018, the OEB issued a Notice of Application and Written Hearing (Notice) which included dates for filing of interrogatories and submissions. No one responded to the Notice. In accordance with the timelines set out in the Notice, on July 24, 2018, OEB staff filed interrogatories in order to gather additional information required for the OEB's final determination of the licence application. On August 1, 2018, Carma filed responses to OEB staff interrogatories.

This submission is being provided by OEB staff following a review of the application and evidence filed in this proceeding.

STAFF SUBMISSION

In its review of applications for a unit sub-metering licence, key areas for consideration by the OEB include the financial position, technical capability and the conduct of the applicant.

OEB staff's interrogatories sought to further the record with respect to the following:

- Technical skills, qualifications and experience of Carma's personnel responsible for billing, collection and call centre activities.
- Processes and procedures that are in place or to be put in place by Carma to ensure compliance with its legal and regulatory obligations.

Financial Viability

According to the evidence provided with the application, OEB staff submits that Carma can reasonably be expected to be financially responsible in the conduct of its business.

Technical Capability

OEB staff submits that according to the application and responses to OEB staff interrogatories, Carma has adequate technical resources with appropriate qualifications and experience to provide intended unit sub-metering services.

Conduct

OEB staff's interrogatories to Carma sought to further the record with respect to Carma's plans to ensure compliance with its legal and regulatory obligations if the applicant were granted renewal of its licence. In its response to OEB staff interrogatory #3, the applicant provided a detailed description of Carma's standards for validating, editing and estimating monthly and interval data to ensure that correct and validated data is used for the billing purposes. Carma also described its processes and procedures that are put in place to expeditiously investigate complaints as required in the Unit Sub-metering Code (Code). In OEB staff's view, Carma has the appropriate systems, policies, procedures and controls in place to comply with its statutory and regulatory obligations as well as the provisions set out in the Code.

CONCLUSION

In consideration of the evidence filed, OEB staff is of the view that Carma has the adequate technical and financial capabilities to provide unit sub-metering services in Ontario. OEB staff is of the view that Carma has the appropriate systems, policies, procedures and controls in place to comply with its statutory and regulatory obligations.

All of which is respectfully submitted.