

March 26th, 2019



SENT VIA EMAIL

Kirsten Walli
Board Secretary, Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Re: Follow Up to Request for Intervener Status, Vista Credit Corp., Enbridge Gas Distribution Inc; Open Bill Access Services; File Number EB-2018-0319

Dear Ms. Walli,

We would like to add to the record our concerns as to the process used to introduce the concept of a potential shutdown of the Open Bill Agreement ("OBA"). Enbridge's initial submission was limited to the financial terms of the Open Bill Agreement ("OBA"), which were then discussed at length with dozens of OBA participants in attendance at meetings held by Enbridge in September of 2018 ("OBA Consultation"). At no time was the concept of a termination of the OBA mentioned by any parties.

Given that the concept of a shutdown was never discussed at the OBA Consultation, Vista disagrees with the statement in the recently posted Partial Settlement Proposal that "parties have agreed that it is appropriate to clarify the scope of the matters considered in this Application to include the question of whether the OBA Program should continue and, if not, how it should be wound down." This statement is inconsistent with the prior facts of the case.

Four of the five parties named in the Partial Settlement Proposal dated March 22, 2019 are not active billers. Accordingly, Vista maintains that the parties named in the Partial Settlement Proposal do not represent the industry that relies on and utilizes the OBA. A number of OBA users like Vista, act as conduits providing administrative and financial services that allow OBA access for hundreds of independent HVAC contractors across Ontario, the needs of which are not represented by the HVAC Coalition.

Although we have now applied for intervener status, the fact that the potential outcome of Enbridge's submission has been allowed to transition so dramatically, from financial terms to the possibility of a program shutdown, in the absence of the input of almost all program users is inappropriate in our opinion. Had the possibility of a shutdown of the OBA been contemplated at the outset, Vista and many others, would have been at the table as interveners.

We await your response to our request for status as an intervener on this application.

Regards,

Glen Leis, CMA, CPA, MBA

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