

VIA COURIER AND EMAIL

August 19, 2019

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

RE: OEB FILE NO: EB-2018-0335

Ms. Walli,

ONIT Energy Ltd. would like to respond to the above Proposal to amend codes for both the Electricity Retailer Code of Conduct and Gas Marketers Code of Conduct.

The proposed OEB proposals and ONIT's responses are below.

OEB Proposal

Every energy retailer must provide the contact info for the OEB to any consumer who makes a complaint and to explain that they may contact the OEB at any time.

ONIT's Response

ONIT does not support a requirement to provide OEB information to every consumer who has a complaint for the following reasons:

- a) We have always prided ourselves on our ability to resolve client concerns as amicably and as expeditiously as possible. In almost every situation, we have been able to resolve issues prior to them being escalated to the OEB. By forcing energy retailers to provide OEB information anytime the client complains, not only would it be counter-intuitive it will dramatically impede the retailer's ability to satisfy client concerns when the consumer will more than likely go directly to the OEB.
- b) Many complaints are not related to any enforceable provisions of any legislation (i.e. concerns regarding the global adjustment, etc.). This would then create an influx of complaints the retailer has no control over and would create undue hardship as a result of the new and unnecessary complaints.
- c) In addition, the consumer already has access to this information through the Price Comparison, Disclosure Statement and during the TPV call.

Energy Solutions for Peace of Mind

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OEB Proposal

With respect to complaints that are forwarded to energy retailers by the OEB, the proposed amendments would require that the energy retailer provide a response within the following timelines:

- a) Two business days, where the complaint relates to an allegation of egregious agent conduct or is otherwise identified as urgent by the Board when forwarding the complaint to the energy retailer: or
- b) 10 business days, in any other case.

ONIT's Response

While we appreciate the gravity of any "egregious" conduct by an Agent, we believe that in order to fully investigate this type of complaint, it may require the Agent in question to be available in person to discuss this matter. Two days would often not be sufficient time to investigate and respond to such a serious allegation. We believe that five days would be more appropriate in order to provide due diligence to such an important matter.

With respect to point b, we have no comment.

OEB Proposal

- a) An energy retailer's response to the OEB include certain prescribed information; and
- b) An energy retailer provide a response to any follow-up questions from the OEB within five business days.

ONIT's Response

ONIT is not prepared to comment on point a until we know what "prescribed information" would be required.

ONIT has no comment on point b.

OEB's Proposal

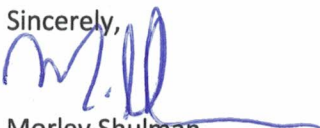
Each energy retailer designate staff to manage consumer issues and provide the OEB with dedicated points of contact, including an email address that is monitored at all times during business hours. The OEB is also proposing that energy retailers communicated through the OEB's E-portal in relation to complaints that have been forwarded to them by the OEB.

ONIT's Response

ONIT has no issues with this proposal.

Should you have any questions, please contact me at your earliest convenience.

Sincerely,



Morley Shulman
Director of Compliance