

July 29, 2020

Ms. Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, ON M4P 1E4  
Email: [BoardSec@oeb.ca](mailto:BoardSec@oeb.ca)

Dear Ms. Long:

**Re: Notice of Proposal to Amend the Standard Supply Service Code  
Ontario Energy Board File No: EB-2020-0152**

In response to the Board's letter dated July 15, 2020, please find below NorthStar Utilities Solutions comments related to the Proposal to Amend the Standard Supply Service Code.

#### About NorthStar –

NorthStar Utilities Solutions ('NorthStar') is a division of N. Harris Computer Corporation. Established in 1976, NorthStar is the CIS billing vendor for 36 Ontario Distributors and USMP, which represents 940,000 electric meter points within the province.

NorthStar was fortunate to be selected as a participant in the 'Enabling Customers to Opt Out of TOU Pricing' Working group to gain early insight into the proposed changes as they relate to the programming changes required to our solution.

#### Coming into Force -

The October 13 date does not give sufficient time for development, deployment, testing and remediation of an automated solution *'to enable consumers to submit their elections to take effect in respect of a billing period that begins on or after November 1, 2020.'*

Given the current timelines, our project plans would accommodate a November 1 coming into force. This is assuming the final regulations are consistent with the proposed amendments and do not introduce any fundamental changes.

Our recommendation is that the final regulation have a coming into force date of November 1 or that the final regulations would prescribe that distributors are required to begin receiving and processing elections on November 1, 2020.

NorthStar has communicated the October 13 timeline for an automated solution is unachievable to our clients so they may submit their comments accordingly.

#### The Election Process -

##### **Distributor Notification to Consumer**

*The notice would also be required to be provided using the same communication channel by which the consumer made the election – ie, online, by phone, by mail or email.*

Our recommendation is that the final regulation be similar to this: *'by the customer's preferred method of communication if known, otherwise by mail'*. NorthStar will be developing an online election form; however, the validation of the election takes place within the CIS. Our solution does not include a mechanism to push notifications for online submissions through our web portal and given current timelines, it would not be cost effective or feasible to do so.

### **Confirmation of Implementation**

NorthStar feels that sending the consumer a letter confirming their election has been successfully processed is sufficient confirmation, and mandating an on-bill message is redundant when the consumer can see the pricing structure on their bill. As mentioned in the letter dated July 15, the Working Group expressed concerns regarding availability of space on the bill, and printing an on-bill message on the second bill after the switch would be even more redundant.

Our recommendation is to remove or make the requirement for on-bill messaging optional. NorthStar currently does not have functionality that would satisfy the reporting requirement in this proposal and given current timelines, it would not be cost effective or feasible to do so.

Please feel free to reach out if you require additional information or if NorthStar can further elaborate on the comments above.

Sincerely,

*Dawn Ivanochko*

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