



Ontario
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BY EMAIL
ktaylor@enwin.com

August 20, 2021

Kristopher Taylor
Vice President, Business Development
ENWIN Energy Limited
4545 Rhodes Drive
Windsor ON N8W 5T1

Dear Mr. Taylor:

**Re: ENWIN Energy Limited
Application for Unit Sub-Metering Licence
OEB File Number EB-2021-0206**

The Ontario Energy Board (OEB) received ENWIN Energy Limited's (ENWIN) application for a unit sub-metering licence on July 15, 2021. The OEB has assigned file number EB-2021-0206 to the application. The application will be decided by an employee of the OEB who has been delegated this authority pursuant to section 6 of the *Ontario Energy Board Act, 1998* (Delegated Authority). The Delegated Authority intends to make a decision on the application without holding a hearing.

The OEB has preliminary reviewed your application. Your application is currently incomplete and cannot be processed until the following has been filed:

1. Section 7, Page 4: Intended Services

As per section 36 of the Ont. Regulation [389/10](#) under the *Energy Consumer Protection Act, 2010*, unit sub-metering services are defined as:

"1. Providing and maintaining unit sub-meters in a multi-unit complex, including billing and collecting payment in respect of the electricity consumed in the multi-unit complex and other associated and ancillary activities."

- a) Please identify specific unit sub-metering services (e.g., billing, collection service and meter reading, call center and customer service, support services – installation and maintenance of meters, meter disconnection and reconnection) the applicant intends to provide to its customers in Ontario.
- b) Does ENWIN intend on providing billing and collection on behalf of third parties? If yes, please identify the parties and explain whether ENWIN's name will appear on the customers' bills.

2. Section 10, Page 5: Technical Resources

In this section of the application, ENWIN provided the following information: "ENWIN Energy Ltd. affiliates have a wide array of metering experience, including registered MSP with the IESO. Any/all contractors that may be used will be experts in their respective fields however specific contractors are not yet know."

This information is not sufficient to assess technical capabilities of the applicant as they relate to providing specific unit sub-metering services.

- a) Please describe the qualifications and experience of ENWIN's personnel who will be responsible for each unit sub-metering service that ENWIN intends to provide.

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

If licensed, ENWIN will have to comply with provisions of the [Unit Sub-metering Code](#) (Code) as a condition of its licence.

- 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 will be put in place by ENWIN to ensure that correct and validated data is used for the billing process.

- ii. Describe how ENWIN will ensure that errors resulted from potential hardware/software malfunctions are detected and fixed before issuance of the invoices to its 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 ENWIN plans to ensure compliance with its legal and regulatory obligations in Ontario. In your response, describe the staff, policies, processes and procedures to be put in place to ensure compliance.
 - ii. Provide the names and titles of all individuals who will be accountable for compliance, complaint handling and quality assurance, and describe fully their expertise in each applicable area.
- c. As a licensed unit sub-metering provider, ENWIN will be required to provide Ontario Electricity Support Program rate assistance to eligible consumers.
 - i. Please confirm that you are aware of this requirement and describe ENWIN's technical ability to meet this obligation.

4. Compliance with Affiliate Relationship Code (ARC)

As stated in the application, ENWIN is an affiliate of the licensed electricity distributor – EnWin Utilities Ltd. As a licensed utility, EnWin Utilities Ltd. is obligated to ensure compliance with provisions of the ARC with respect to its relationship with affiliate that is an energy service provider.

- a) Please provide service agreement between EnWin Utilities Ltd. and ENWIN. The value of the service agreement should be specified to determine the need of a business case for this application.
- b) Please describe how compliance with all applicable sections of the ARC will be achieved.
- c) Please provide a list of Board of Directors for ENWIN Energy Ltd. and EnWin Utilities Ltd.

The OEB will resume processing your application once the above information has been filed. If the above information is not filed within 30 days of the date of this letter, the OEB may close the file for this application.

Once your application is complete, the Delegated Authority expects to issue a final decision on your application within 60-90 days.

In the event the Delegated Authority decides to deny or otherwise modify the relief you requested in your application, you will be given an opportunity to provide comments. The Delegated Authority will consider your final comments, if any, prior to issuing a decision and order.

Please file two paper copies of the additional material and an electronic version in Word and in searchable Adobe Acrobat (if available) with the Registrar. Electronic copies should be e-mailed to registrar@oeb.ca.

Any questions relating to this letter or your application should be directed to Natasha Gocool, Analyst at Natasha.Gocool@oeb.ca. Please refer to the OEB file number noted above in all future correspondence to the OEB regarding your application.

Yours truly,

Original Signed By

John Pickernell
Manager, Applications Administration