

January 16, 2025

USMP Review Team
Ontario Energy Board
2300 Young Street
27th Floor, P.O. Box 2319
Toronto, ON
M4P 1E4

RE: Wyse's Response to a Review of Consumer Protection Framework for Customers of Unit Sub-Meter Providers (File no: EB-2023-0345)

Dear USMP Project Team,

Wyse Meter Solutions (Wyse) would like to thank the Ontario Energy Board for the engagement that it is leading on the, "*Review of the Consumer Protection Framework for Customers of Unit Sub-Metering Providers (USMP) | Ontario Energy Board File No. EB-2023-0345*". We have greatly appreciated the opportunity to bring our experiences from across North America to help inform outcomes, participate in the engagement process, and provide feedback on the OEB's proposed amendments to the Unit Sub-Metering Code (USM Code).

As background, with over 280,000 suites under contract in Ontario, Wyse delivers smart utility submetering and expense management solutions to building owners and developers to bring the best environmentally sustainable services to their residents. Our smart submetering technology offers revenue-grade submetering to help consumers cut expenses and the consumption of energy in residences – also allowing for the simple bundling of water, electricity and thermal services for consumers. We provide services to multi-residential rental dwellings, condominiums, and commercial spaces.

Wyse appreciates the OEB's work and efforts consulting on the development of the December 5th Report entitled [Review of Consumer Protection Framework for Customers of Unit Sub-Meter Providers](#). We would also like to recognize that the recommendations stemming from the report align with Wyse's previous feedback and position on issues that concern winter disconnection, the application of reconnection fees, notification of changing conditions of service and other issues that increase awareness and transparency with respect to the consumer protection framework.

Moreover, after reviewing the OEB's proposed amendments to the Unit-Sub Metering Code, we are supportive of all new measures that have been outlined and believe these changes will serve well to increase awareness of consumer protection and transparency amongst USMPs. We look forward to seeing these changes implemented in the spring and would welcome the opportunity to speak further with staff at the OEB should any new questions arise.

Wyse's Feedback to Proposed OEB Amendments

Wyse was pleased to see that the proposed amendments seek to increase awareness of the consumer protection framework for customers of USMPs by requiring USMP providers to include the following:

1. A description in our Conditions of Services of policies regarding the disconnection and reconnection of residential consumers in the winter and the application of reconnection charges;
2. Providing residential consumers with certain consumer protection information twice annually;
3. Notifying the OEB of any change to the mandatory content that must be included in their Conditions of Service within 5 days' time; and
4. Amendments to the language in USM Code.

Winter Disconnection:

Wyse supports the proposed amendments to the USM Code that pertains to inclusion as a part of the Mandatory Conditions of Service (Section 3.2.5) the following sections:

(d.1) its policy in relation to the timing of the application of any charge for reconnecting residential consumers who have been disconnected for non-payment, and any conditions under which the reconnection charge may be waived;

(e.1) its policy in relation to disconnecting residential consumers for non-payment at any time during the winter period and in relation to the reconnection of residential consumers during the winter period who had been disconnected for non-payment, which for greater clarity includes a policy permitting disconnection and/or refraining from reconnection during the winter period;

Requirement to Provide Notification of Changes to Conditions of Service:

Wyse is supportive of the OEB's proposal to require USMP's to notify the OEB within 5 business days of making any changes to our Conditions of Service related to the items set out in section 3.2.5 which pertain to winter disconnection, reconnection, the timing of reconnection charges and any other mandatory content.

While Wyse and USMP's must provide advanced notice to our customers of any changes and are required to make our Conditions of Service publicly available, we believe that this amendment will help to increase transparency within the sector between the OEB and USMPs. As this is similar to the requirements electricity distributors already undertake, we see no issue with this being a requirement for USMPs moving forward.

Requirement Related to Raising Awareness of the Consumer Protection Framework:

As a company committed to enhancing our operations to ensure our customers receive effective customer service and transparency to ensure satisfaction and positive experiences for our end-use customers, Wyse is supportive of the actions the OEB has taken through the proposed amendments to improve customer awareness and increase transparency around certain rules that are in place to protect their interests. We are supportive that all USMPs will be required to provide communication to its residents, twice annually, on the availability of arrears payment agreements, the availability of financial assistance programs for eligible low-income consumers, how to access the USMP's Conditions of Service and the OEB's contact information for consumer complaint purposes.

Amendments to Update Language in USM Code:



Wyse is supportive and has no further comments with respect to the OEB's decision to make minor changes to the language in the USM Code.

Conclusion

In summary, Wyse would like to thank the OEB for the opportunity to provide input into the "Review of the Consumer Protection Framework for Customers of Unit Sub-Metering Providers (USMP) | Ontario Energy Board File No. EB-2023-0345". We would welcome the opportunity to speak further with staff at the OEB about the information provided in the enclosed feedback should any new questions arise.

Sincerely,

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