

**BY EMAIL and RESS**

January 16, 2025

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, Ontario  
M4P 1E4

Dear Ms. Marconi:

**EB-2023-0345 Proposed Amendments to the Unit Sub-Metering Code to Increase Awareness of the Consumer Protection Framework for Customers of Unit Sub-Meter Providers - Building Owners and Managers Association's Comments**

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On December 5, 2024, the Ontario Energy Board (OEB) issued a Notice of Proposal to amend the Unit Sub-Metering Code. The proposed amendments are intended to increase awareness of the consumer protection framework for customers of unit sub-meter providers (USMPs) by requiring USMPs to:

- include in their Conditions of Service a description of policies regarding:
  - i. the disconnection and reconnection of residential consumers in the winter period; and
  - ii. the application of reconnection charges;
- provide their residential consumers with certain consumer protection information twice annually; and
- notify the OEB of any change to the mandatory content that must be included in their Conditions of Service.

After reviewing the OEB's report entitled Review of Consumer Protection Framework for Customers of Unit Sub-Meter Providers, issued on December 5, 2024 and its proposed amendments to the Unit Sub-Metering Code as described in the December 5, 2024 Notice of Proposal to Amend a Code, the Building Owners and Managers Association (BOMA) supports the proposed amendments and believes that they will effectively increase awareness of the consumer protection framework for USMP customers.

BOMA participated in one of the OEB hosted targeted meetings (Group 3: Property Owners, Managers, Developers and Housing Services) in May 2024 and had provided its view on the existing customer service rules applicable to USMPs. BOMA appreciates the opportunity to provide feedback to these important issues. BOMA also commends the OEB's recent effort to raise USMP consumer awareness about the protection rules and policies that currently exist to

protect them, including launching a dedicated webpage to provide USMP customers with relevant information on the sector and the protection rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Clement Li".

**Clement Li**

Director, Policy & Regulatory Development

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