

July 18, 2007

Board Secretary
Ontario Energy Board
2300 Yonge Street
Site 2700
Toronto, ON M4P 1E4

By email: boardsec@oeb.gov.on.ca

Re: EB-2007-0662 Comments re: Staff Research Paper on the Affiliate Relations Code for Electricity Distributors and Transmitters.

On behalf of the Federation of Rental-housing Providers of Ontario (FRPO), I am pleased to write in support of comments provided by the Building Owners and Managers Association of Greater Toronto (BOMA) regarding the Affiliate Relations Code (ARC).

FRPO is Ontario's leading advocate for quality rental housing, representing over 800 private owners and managers who supply over 250,000 rental suites across the province. Our members strongly believe that the rental housing sector is best served by a competitive marketplace that offers choice and affordability in the provision of energy services.

We support the objectives of the ARC in enhancing the development of a competitive market while serving the interests of ratepayers. Specifically, enhancing competition in the market of the provision of energy services is of critical importance to ratepayers in the rental housing sector.

Many rental housing providers are currently looking forward to fulfilling the Ministry of Energy's policy objective of implementing electrical smart submetering throughout the province by 2010. Employing this technology will result in substantial improvements in energy conservation among residential tenants. Successful implementation, however, requires cost-effective and wide-ranging choice and supply that can only be provided

through an open, competitive marketplace. Energy conservation efforts and affordability for residential households will be ill-served by any monopoly position assumed by local distribution companies (LDC's) in this market.

FRPO supports BOMA's contention that the Ontario Energy Board has a duty to protect consumers and ratepayers from the potentially abusive control exerted by local utilities in the provision of electrical smart submetering installation and related services. For this reason, the Affiliate Relations Code should facilitate competition by allowing both LDC's and private submetering companies to provide smart submeter energy services throughout Ontario. Local distribution companies should be compliant with any provision in the Code that inhibits anti-competitive behaviour by utilities or their affiliates.

As housing providers across Ontario continue to look for innovative ways of reducing energy consumption and achieving conservation potential, efficient and cost-effective implementation of electrical smart submetering will undoubtedly be a key measure in these efforts. The success of this implementation will be driven by open and fair competition in the provision of a broad range of customer services related to metering, billing, energy efficiency and energy purchasing services.

In closing, FRPO urges the Ontario Energy Board to ensure the existing Affiliate Relations Code provisions that promote competition in the market and prevent the abuse of monopoly power by local distribution companies be upheld and enforced. This effort will protect consumers and ratepayers, serve the public interest and help achieve our shared objective of reducing energy consumption.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Chopowick', with a stylized flourish at the end.

Mike Chopowick
Manager of Policy