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VIA EMAIL & COURIER

John Zych
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Suite 2700
Toronto, Ontario
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Dear Mr. Zych:

Re: EB-2004-0205
Standard Supply Service Code relating to the Regulated Price Plan

Ontario Energy Savings L.P. ("OESLP") is writing in response to the Ontario Energy Board's (the "Board") invitation to comment on the proposed amendments to the Standard Supply Service Code ("SSS") relating to the Regulated Price Plan ("RPP").

OESLP wishes to bring the following matter to the Board's attention with respect to the SSS code and, specifically, Section 3.7 of the code:

When an electricity customer elects to leave the RPP to purchase electricity from a retailer, the distributor charges or credits the RPP customer a final RPP variance settlement amount. This variance settlement amount is calculated using the customer's annual consumption, multiplied by the RPP Variance Settlement Factor that is in effect on the date of the consumer's final meter read.

Under the current rules, when a retail electricity customer moves within Ontario from one electricity distributor to another they will again have to unfairly settle their account. This second RPP Variance Settlement charge is triggered because the customer must first default to RPP supply prior to being returned back to the retailer, owing to industry rules and the inability to move seamlessly across electric utilities without first reverting to RPP supply.

It is OESLP's understanding that a customer should only incur the RPP charge in the following circumstances:

- a) when the customer signs a contract with an electricity retailer;
- b) when the customer cancels its account and moves outside of Ontario; and
- c) when the customer elects the spot market pricing option.

OESLP respectfully submits that the appropriate wording is required in the SSS document to remedy how utilities process a retail electricity customer that is migrating to another provincial electricity utility.

OESC suggests the adoption of a standard method of indicating to a utility that a customer was already enrolled with a retailer. This standard method could be communicated in one of several ways, by: an indicator on the enroll transaction, through an email or using a spreadsheet.

In summary, OESLP argues that changes are required to the SSS code in order to ensure that retail electricity customers are not unfairly subjected to duplicate RPP Variance Settlement charges and that a standard methodology be adopted to deal with this matter.

Thank you for the opportunity to comment on the proposed amendments.

Please contact the undersigned if additional information is required.

Yours truly,

A handwritten signature in black ink, appearing to read 'N. Ruzycki', written in a cursive style.

Nola L. Ruzycki
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