

June 1, 2005

Mr. John Zych – Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto, ON, M4P1E4

Dear Mr. Zych:

**Re: Comments on the Notice of Proposed Amendment to the Standard Supply Service Code
– Bill Presentment and the Final RPP Variance Settlement – Board File # RP-2004-0205**

The Electricity Distributors Association (EDA) welcomes the opportunity to comment on the Board's proposed Standard Supply Service (SSS) code.

Local Distribution Companies (LDCs) have implemented the Regulated Price Plan (RPP) that came into effect April 1, 2005. Amendments to the SSS code will enable them to address how the "final RPP variance settlement" should be presented on electricity bills when consumers leave the plan.

The EDA welcomes the Board's proposal to adopt a consistent approach and standardized section with specific nomenclature on the bills for both Distributors and Retailers. In recognition of subsequent systems requirements, it is a helpful accommodation that the proposed code amendments have an acceptable review period before implementation on July 1, 2005.

Through the LDC membership, the EDA identified some issues that should be addressed in the proposed SSS code amendment:

- Some LDCs' billing systems can only accommodate 20 characters rather than the 29 comprised in the proposed terminology of "Final RPP variance settlement". The EDA recommends dropping the word "settlement" in the terminology to "Final RPP variance" to accommodate all LDC systems.
- A standardized explanation must be provided that can be included in the glossary of terms that accompanies each bill in order to assist LDCs in explaining the line to consumers.
- Clarification is required whether LDCs are required to show the kWh used for the variance calculation and the rate that was applied to the consumption. The preference would be not to show the calculation since it's based on historical consumption and would be different than the current bill amount. This would only create further confusion for consumers and lead to an increase in call volumes.

- It is imperative that utilities be kept whole in this process. Accommodating this change will result in additional costs to LDCs in changing their systems, processes and educating consumers.

Some LDCs have been awaiting clear direction from the Board on how to proceed in this matter. Other LDCs have proactively designed their systems to accommodate an additional line on the bill in support of this initiative. They recognize and acknowledge the objectives a separate line will achieve as outlined in the Board's notice of proposal. Including the charge in the electricity charges would be inaccurate. Also, many customers prefer the breakout of charges for their analysis.

The EDA looks forward to continuing to work with the Board to ensure as smooth an implementation of the changes to the electricity bill as possible is achieved.

Yours truly,

Debora Steggles
Vice-President – External Affairs and Member Relations
Electricity Distributors Association