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Paul B. Pudge  
Ontario Energy Board  
P.O. Box 2319  
26<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Attention: Paul B. Pudge

**Re: RP-2002-0146 - Notice of Proceeding to Amend the Distribution System Code and Retail Settlement Code– Consumer Security Deposit Policies**

Dear Mr. Pudge,

The Milton Chamber of Commerce appreciates the opportunity to comment on the proposed amendment to the distribution system code and retail settlement code regarding consumer security deposit policies.

We took an active role in the consumer security deposit policy working group and sub-committee conducted in 2002-2003 and are pleased to support the proposed policy changes. It has been our contention since the process began, to have good payment history recognized when establishing policies around security deposits.

The Milton Chamber of Commerce would like to comment on the following, based on the outlined questions in Paragraphs 25 to 31 in your letter of June 10<sup>th</sup>, 2003 regarding Consumer Security Deposit Policies – RP-2002-0146:

1) In our opinion, the only area that needs further clarification involves the calculation of the security deposit: How does choosing an alternative billing method such as interval meter billing affect the calculation of the maximum security deposit an LDC can charge?

2) We believe that 3 months is an appropriate period of time for the LDC's to bring their security deposit policies into compliance and properly communicate those changes to their customers.

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3) We agree with the following security deposit requirements as outlined in your letter of June 10<sup>th</sup>, 2003 regarding Consumer Security Deposit Policies – RP-2002-0146, Paragraph 17 stating:

Whether a consumer is required to provide a deposit would be based on the consumer's good payment history ("GPH") which may come from another Ontario electricity or natural gas LDC. If required to provide a deposit, residential consumers would provide a deposit for up to a maximum of 1 year, small and medium size customers (<50kW) would be required to provide one for up to 5 years and large customers (>50kW), representing the greatest degree of non-payment risk, would have their deposit refunded after 7 years of GPH.

- 4) We agree that consumer deposits should be reviewed and updated annually by each LDC. The responsibility to recover any security deposits paid, would become that of the individual customer following the recommendations of the OEB for customers <50kW and >50kW.
- 5) The Milton Chamber of Commerce supports the inclusion of GPH from another Utility as proof of not requiring a consumer security deposit if they meet the established criteria of the OEB.
- 7) We believe the method for calculating a security deposit for non-residential <50kW consumers using customer specific average consumption is appropriate.

The Milton Chamber of Commerce applauds the OEB for their efforts in bringing a province-wide solution to consumer security deposit policies through the inclusive Working Group Process. We understand the difficulties surrounding change and appreciate the opportunity to be part of the solution.

Sincerely,

Melissa DeBrouwer, President  
Milton Chamber of Commerce

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