

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto ON M4P 1E4
Telephone: 416-481-1967
Facsimile: 416-440-7656
Toll free: 1-888-632-6273

**Commission de l'énergie
de l'Ontario**
C.P. 2319
27^e étage
2300, rue Yonge
Toronto ON M4P 1E4
Téléphone: 416-481-1967
Télécopieur: 416-440-7656
Numéro sans frais: 1-888-632-6273



BY EMAIL AND WEB POSTING

OCTOBER 5, 2015

NOTICE OF PROPOSAL TO AMEND A CODE AND TO AMEND A RULE

**PROPOSED AMENDMENTS TO THE ELECTRICITY RETAILER CODE OF CONDUCT,
THE CODE OF CONDUCT FOR GAS MARKETERS, THE RETAIL SETTLEMENT CODE
AND THE GAS DISTRIBUTION ACCESS RULE**

OEB FILE NO.: EB-2015-0268

**To: All Licensed Electricity Retailers
All Licensed Gas Marketers
All Licensed Electricity Distributors
All Natural Gas Distributors
All Participants in EB-2014-0158 (Consultation on the Effectiveness of Part II of
the *Energy Consumer Protection Act, 2010*)
All Other Interested Parties**

The Ontario Energy Board (OEB) is giving notice of a proposal to amend the following rules and codes under sections 45 and 70.2 of the *Ontario Energy Board Act, 1998* (OEB Act):

- i. the Electricity Retailer Code of Conduct (Retailer Code);
- ii. the Code of Conduct for Gas Marketers (Marketer Code);
- iii. the Retail Settlement Code (RSC); and
- iv. the Gas Distribution Access Code (GDAR).

The purpose of the proposed amendments is to address certain findings and implement certain recommendations set out in the OEB's report called "[Consumers Come First: A Report of the Ontario Energy Board on the Effectiveness of Part II of the *Energy Consumer Protection Act, 2010*](#)" (ECPA Report), which was submitted to the Minister of Energy on June 1, 2015. The proposed amendments are also required to support proposed legislative changes that, if made, would amend the rules governing electricity retailers and gas

marketers (collectively, suppliers) set out in and under the *Energy Consumer Protection Act, 2010* (ECPA) in respect of low volume consumers.

A. Background

Further to the request by the Minister of Energy made under section 30 of the ECPA, the OEB conducted a review of Part II of the ECPA, which deals with electricity retailing and gas marketing. Details of the consumer research and stakeholder consultation activities undertaken as part of the OEB's [ECPA review project webpage](#).

The OEB's review revealed that the ECPA has generally been effective in improving consumer protection in the retail energy markets, and is among the most extensive legislation of its kind in North America. Also, there is strong support among stakeholders and consumers for the consumer protection measures contained in the ECPA.

However, the OEB's review also indicated that problems remain. Highlights of key findings include:

- Consumer understanding and awareness of the energy sector, retail energy markets and the ECPA is generally low, making it difficult for consumers to understand their choices and make valid price comparisons. The need for increased plain language in consumer-facing documents was a common theme during the consultation process.
- The way electricity bills are presented makes it difficult for consumers to compare prices when considering whether to sign a retail electricity contract or remain with their utility.
- Roughly one-third of current residential and non-residential contract holders surveyed were unaware that they have a contract.
- Door-to-door activities are a continuing concern. Consumers do not generally search out energy retailers. Based on data from energy retailers, in 2014 about 50 per cent of all retail electricity contracts and about 46 per cent of all retail natural gas contracts were sales transacted using door-to-door marketing. For many consumers in our survey, the experience with a sales agent at the door was not always a positive one, and aggressive sales tactics was most often cited as the reason. Sales agent conduct continues to be an important source of complaints made to the OEB and an ongoing subject of our compliance activities.

The ECPA Report includes 14 recommendations to further enhance consumer protection in the retail energy markets. Some of the measures are intended to enhance energy literacy and consumer awareness to help consumers better understand what they are buying and from whom. Other measures are intended to address ongoing concerns, including a need for greater protection from unfair business practices at the door. Some of the OEB's recommendations can be implemented under the OEB's existing authority, while others are dependent on legislative change, whether to the ECPA or regulations.

On June 2, 2015, the government introduced Bill 112, the *Strengthening Consumer Protection and Electricity System Oversight Act, 2015*, in order to implement a number of the recommendations outlined in ECPA Report, including a ban on door-to-door sales to residential consumers and a requirement for all contracts to be subject to verification. Some of the other recommendations, such as prohibiting the auto-renewal of gas contracts and adding a new cancellation right, require amendments to regulations. To that end, on August 28, 2015, the government posted for comment a [summary of its proposed changes](#) to Ontario Regulation 389/10 (General) made under the ECPA (the ECPA Regulation).

The OEB is proceeding to solicit comment on proposed amendments to its regulatory instruments at this time, recognizing that changes to Bill 112, if passed, may affect the proposed amendments described in this Notice and may result in the need for incremental changes to the OEB's proposals. The same is true of the content of the ECPA Regulation amendments, if made. For elements of the OEB's proposals that are contingent on Bill 112 being passed or on finalization of the ECPA Regulation amendments, the OEB does not intend to finalize and implement its proposals until the legislative process has run its course.

The proposed amendments described in this Notice address only a sub-set of the recommendations contained in the ECPA Report. Section F below explains the OEB's intentions regarding the implementation of recommendations that are not addressed in this Notice and that are not otherwise proposed to be completely addressed through Bill 112, if passed, or the proposed amendments to the ECPA Regulation, if made.

B. Purpose and Summary of the Proposed Amendments

The main purpose of the proposed amendments to the OEB's codes and rules is to increase consumer understanding of retail contracts, better educate and inform consumers about their energy supply choices, and provide additional protection for consumers to protect against unfair business practices at the door.

In addition, some of the proposed amendments to the OEB's codes and rules are required to ensure consistency with Bill 112, if passed, and the government's proposed amendments to the ECPA Regulation, if made. For example:

- a new provision is proposed to be added to the Retailer Code and the Marketer Code to clarify that nothing in those Codes should be construed as permitting door-to-door sales and marketing where prohibited under the ECPA or the ECPA Regulation; and
- the certificates of compliance that suppliers are required to file with the OEB will be updated to reflect the new requirements.

The main elements of the OEB's proposed amendments are described below. All of the proposed amendments to the Retailer Code and the Marketer Code are shown in the comparison version of those documents appended to this Notice as Attachments A and B, respectively. The proposed amendments to the RSC are set out in Attachment C, and the proposed amendments to the GDAR are set out in Attachment D.

1. Plain language contracts

In its ECPA Report, the OEB noted that certain key provisions in retail contracts, such as cancellation rights and fees, are of particular importance to consumers and need to be emphasized and in plain language. Some other jurisdictions require some form of plain language contract terms to be available to consumers.

The proposed amendments to the Retailer Code and the Marketer Code would require suppliers to: (a) use certain standardized headings in their contracts, principally for information that is required to appear in contracts under the ECPA Regulation; and (b) include an OEB-approved cover sheet with their contracts. The cover sheet would contain a plain language description of certain contract provisions. The cover sheet will be issued for comment separately in the near term, at the same time as the OEB will issue for comment proposed revisions to its Disclosure Statements, Price Comparison templates and scripts, and a proposed new "tip sheet" (described below).

The OEB considers this to be an interim approach, at least for contracts offered to residential consumers. The OEB believes that standardized contracts will be clearer for consumers and enhance consumer understanding of their rights and obligations. However, the OEB recognizes that the development of a standardized contract will require time and more extensive consultation with the industry and others in order to ensure that contracts suit the needs of both suppliers and consumers. The OEB will therefore pursue this initiative as a separate consultation in the future.

2. *Making retail contracts more visible on the bill*

As noted in the ECPA Report, consumer bills are not presented in a way that makes it clear to consumers that the price that they are paying for their natural gas or electricity is the price under a retail contract that they have with a supplier. Several other jurisdictions require that information about a retail contract or the retail contract price be included on or with the bill.

The OEB proposes to amend the RSC and the GDAR such that a distributor-consolidated bill issued to a low volume consumer that has a contract with a supplier must include a statement, in capital letters, to the effect that the consumer's supply is being provided under contract. The OEB also proposes to require distributors to provide for up to 500 text characters for the display of this statement, together with the supplier's name, telephone number, website, and e-mail address on the bill.

The OEB believes that there is merit in considering additional changes to the bill, and more specifically to requiring that the commodity cost based on the contract price and the commodity cost based on the system supply price appear on the bill. However, the OEB is aware that electricity bills in particular are already complex and that additional requirements have recently been prescribed in relation to the Ontario Electricity Support Program and the Debt Retirement Charge. Although amendments to the RSC and the GDAR are therefore not being proposed at this time in relation to the inclusion of both the contract and system supply costs on bill, it would be helpful to the OEB if interested parties could include in their comments made in response to this Notice their thoughts on how the approach might best be implemented with minimal risk of consumer confusion and minimal operational concerns.

The OEB will also consult directly with the Electronic Business Transaction (EBT) Standards Working Group to identify whether any changes are required to the EBT Standards in respect of its current and potential future proposals.

3. *Consumer "tip sheet"*

Although door-to-door sales at a consumer's home will be prohibited in the future if Bill 112 is passed in its current form, marketing and advertising at the door will not. The OEB believes that consumer understanding will be improved if residential consumers have ready access to information from different sources at any given point in time.

The OEB therefore proposes to amend the Retailer Code and the Marketer Code to require suppliers to provide an OEB-approved "tip sheet" to consumers when engaged in marketing activities at a consumer's home. This is what is contemplated by the

proposed new requirement in Part B of both Codes to “provide and leave with the consumer such documents as may be approved by the OEB”.

The “tip sheet” will include information in plain language that is useful to consumers in helping them think about whether a retail energy contract is right for them or not. As noted above, the proposed “tip sheet” will be issued for comment separately in the near term.

4. *Written notice to consumers of the switch to a supplier*

To promote consumer awareness that their supply arrangements are changing as a consequence of having entered into a contract, the OEB proposes to amend the RSC and the GDAR to require distributors to provide written notice to low volume consumers of the switch to a supplier.

The notice must include certain prescribed information, such as the name of the supplier, the effective date of the switch, and whether the consumer will continue to receive a bill from the distributor. Although the OEB understands that distributor-consolidated billing is pervasive in both the gas and electricity sectors at the present time, this may not always be the case. The OEB believes that this measure will be most effective if sent separate and apart from any other correspondence from the distributor, including the bill. The proposed amendments to the RSC and the GDAR have been drafted accordingly. The OEB intends to prepare a form of letter that distributors may use for purposes of this new notice requirement.

5. *Housekeeping amendments*

Minor housekeeping amendments, unrelated to the OEB’s review of the ECPA, are proposed to the Retailer Code and the Marketer Code. For instance, the transitional provisions (Part C in each of the codes) are no longer required, and will therefore be deleted.

C. Proposed Amendments to Disclosure Statements, Price Comparison Templates and Scripts

As noted in the ECPA Report, disclosure statements, price comparisons and standard scripts are important consumer protection measures, and are broadly used elsewhere. Based on the OEB’s consumer research and a review of consumer complaints, however, these measures may not be working as well as they could. In the near term, the OEB will issue proposed revised versions of these materials for comment. The OEB’s objective is that these materials be more consumer-friendly, simpler and as short as possible. The proposed revised scripts accommodate verification of internet contracts, as proposed under

Bill 112, and build on an earlier consultation with suppliers that was suspended pending completion of the OEB's ECPA review.

As shown in Attachments A and B, the OEB is proposing amendments to the Retailer Code and the Marketer Code to allow suppliers greater flexibility in relation to certain elements of the verification script, similar to the flexibility that currently exists with the renewal script.

D. Anticipated Costs and Benefits

Some of the proposed amendments to the Retailer Code and the Marketer Code are required in order to align the provisions of those regulatory instruments with proposed changes to the ECPA and the ECPA Regulation. Other proposed amendments to the Retailer Code, the Marketer Code, the RSC and the GDAR contain new rules that the OEB considers desirable to address findings and recommendations made in its ECPA Report.

The OEB believes that the proposed amendments will enhance the level of consumer protection afforded to low volume consumers. As noted above, the OEB believes that the proposed amendments will increase consumer understanding of retail contracts, better educate and inform consumers about their energy supply choices, and provide additional protection for consumers to protect against unfair business practices.

The OEB anticipates that suppliers will incur costs to comply with the proposed amendments to the Retailer Code and the Marketer Code, at least in terms of the training of salespeople and verification representatives in relation to the use of revised scripts and in relation to the use of other revised or new consumer-facing materials. The OEB does not anticipate that the proposed amendments to the RSC and the GDAR will require suppliers or distributors to incur material costs.

E. Coming into Force

The OEB proposes that the final amendments to each code and rule will come into force on the later of January 1, 2016 or the date on which Bill 112, if passed, and amendments to the ECPA Regulation, if made, come into force.

F. Other Measures for Future Implementation

The OEB's ECPA Report contains a number of recommendations that are not proposed to be implemented through this consultation. The OEB takes this opportunity to advise of its intentions in respect of the implementation of those recommendations:

- i. *Comparative Pricing Website:* As indicated in the ECPA Report, the OEB intends to develop an OEB-supervised price comparison website. The OEB currently anticipates that the website will be operational in the first half of 2016. As website development continues, the need for supporting regulatory requirements may be identified. The OEB will propose amendments to the Retailer Code and the Marketer Code as required to support the website at a later date.
- ii. *Complaint and Compliance Information:* The OEB noted in the ECPA Report that consumers should have ready access to information that allows them to understand the “track record” of different suppliers. The OEB expects to coordinate implementation of this recommendation with implementation of the comparative pricing website referred to in (i) above, including as to timing of the issuance of any supporting proposed amendments to the Retailer Code and the Marketer Code.
- iii. *Consultation on Additional Measures for Low-income Consumers:* One of the recommendations in the ECPA Report was to conduct a separate consultation to consider whether additional measures are required to meet the unique needs of low-income consumers. Two issues were specifically identified in the ECPA Report in that regard; namely, (1) cancellation fees and gift cards; and (2) other incentives offered by suppliers as inducements. The proposed amendments to the ECPA Regulation are expected to include provisions that relate to these issues. Implementation of other OEB recommendations will benefit low-income consumers as they will all low volume consumers. The OEB therefore believes that it is appropriate in the circumstances to defer its consultation on additional measures for low-income consumers until all of the new rules have been operational for a reasonable period of time.
- iv. *Supplier pricing practices/hedging:* The ECPA Report recommended that suppliers be required to enter into financial agreements to minimize the risk associated with procuring supply of the energy commodity and the associated potential for that risk to be passed on to consumers. The OEB believes its approach to this recommendation will require additional time and extensive consultation, and is deferring this initiative to a later date.

G. Invitation to Comment

All interested parties are invited to submit written comments on the proposed code and rule amendments, as set out in Attachments A to D, by **October 21, 2015**, in accordance with the filing instructions set out in section I below.

H. Cost Awards

Cost awards will be available under section 30 of the OEB Act to eligible participants, up to a maximum of 25 hours per eligible participant, in respect of the provision of written comments on the following: (i) the proposed amendments to the codes and rules described in this Notice, as set out in Attachments A to D; (ii) the updated disclosure statements, price comparisons, and scripts, when issued for comment; and (iii) the proposed “tip sheet” and contract cover sheet, when issued for comment. Any costs awarded will be recovered from licensed electricity distributors (25%), gas distributors (25%), licensed electricity retailers (25%) and licensed gas marketers (25%). Costs will be apportioned amongst these classes as follows:

- i. for each of the electricity distributor and gas distributor groups, based on their respective distribution revenues; and
- ii. for each of the electricity retailer and gas marketer groups, based on their respective share of the low volume consumer market. The OEB will, in due course, direct licensed retailers and marketers to provide updated low volume customer figures for this purpose. Given expected concerns regarding the confidentiality of relative market share information, the OEB will act as a clearinghouse for the purposes of the payment of cost awards to eligible participants.

The OEB considers it expedient to extend cost award eligibility in this consultation to any participant who was determined by the OEB to be eligible for costs in the EB-2014-0158 consultation. These participants therefore need not file a new request for cost award eligibility, and licensed suppliers, licensed electricity distributors and gas distributors will not have an opportunity to object to their eligibility.

Any other person intending to request an award of costs must file with the OEB a written submission to that effect by **October 9, 2015** and in accordance with the filing instructions set out in section I below, identifying the nature of the person’s interest in this process and the grounds on which the person believes that they are eligible for an award of costs (addressing the OEB’s cost eligibility criteria as set out in section 3 of the OEB’s *Practice Direction on Cost Awards*). An explanation of any other funding to which the person has access must also be provided, as should the name and credentials of any lawyer, analyst or consultant that the person intends to retain, if known. All requests for cost eligibility will be posted on the OEB’s website.

Licensed suppliers, licensed electricity distributors and gas distributors will be provided with an opportunity to object to any of the requests for cost award eligibility. Any such objections must be filed with the OEB by **October 16, 2015**. Any objections will be posted on the

OEB's website. The OEB will then make a final determination on the cost eligibility of the requesting participants.

I. Filing Instructions

Three (3) paper copies of each filing must be provided, and should be sent to:

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, Ontario M4P 1E4

The OEB requests that interested parties make every effort to provide electronic copies of their filings in searchable/unrestricted Adobe Acrobat (PDF) format, and to submit their filings through the OEB's web portal at <https://www.pes.ontarioenergyboard.ca/eservice/>. A user ID is required to submit documents through the OEB's web portal. If you do not have a user ID, please visit the "e-filings services" webpage on the OEB's website at www.ontarioenergyboard.ca, and fill out a user ID password request.

Additionally, interested parties are requested to follow the document naming conventions and document submission standards outlined in the document entitled "RESS Document Preparation – A Quick Guide" also found on the e-filing services webpage. If the OEB's web portal is not available, electronic copies of filings may be filed by e-mail at boardsec@ontarioenergyboard.ca.

Those that do not have internet access should provide a CD containing their filing in PDF format.

Filings to the OEB must be received by the Board Secretary by **4:45 p.m.** on the required date. They must quote file number **EB-2015-0268** and include your name, address, telephone number and, where available, your e-mail address and fax number.

If the written comment is from a private citizen (i.e., not a lawyer representing a client, not a consultant representing a client or organization, not an individual in an organization that represents the interests of consumers or other groups, and not an individual from a regulated entity), before making the written comment available for viewing at the OEB's offices or placing the written comment on the OEB's website, the OEB will remove any personal (i.e., not business) contact information from the written comment (i.e., the address, fax number, phone number, and e-mail address of the individual). However, the name of

the individual and the content of the written comment will be available for viewing at the OEB's offices and will be placed on the OEB's website.

This Notice, including the proposed amendments to the OEB's codes and rules set out in Attachments A to D, and all written comments received by the OEB in response to this Notice will be available for public viewing on the OEB's web site at www.ontarioenergyboard.ca and at the office of the OEB during normal business hours.

If you have any questions regarding the proposed code amendments described in this Notice, please contact Lou Mustillo at Lou.Mustillo@OntarioEnergyBoard.ca or at 416-544-5185. The OEB's toll free number is 1-888-632-6273.

DATED October 5, 2015

ONTARIO ENERGY BOARD

Original Signed By

Kirsten Walli
Board Secretary

Attachments: Attachment A – Proposed Amendments to the Electricity Retailer Code of Conduct
 Attachment B – Proposed Amendments to the Code of Conduct for Gas Marketers
 Attachment C – Proposed Amendments to the Retail Settlement Code
 Attachment D – Proposed Amendments to the Gas Distribution Access Rule

Attachment A

Proposed Amendments to the Electricity Retailer Code of Conduct

(Separate document attached)

Attachment B

Proposed Amendments to the Code of Conduct for Gas Marketers

(Separate document attached)

Attachment C

Proposed Amendments to the Retail Settlement Code

1. Section 1.2 of the Retail Settlement Code is amended by adding the following new definition after the definition of “lock box arrangement”:

“low volume consumer” means a consumer who annually uses less than 150,000 kilowatt hours of electricity or such other amount as may be prescribed for the purposes of section 2 of the Energy Consumer Protection Act, 2010;

2. Section 7 of the Retail Settlement Code is amended by adding the following new section 7.2.3:

7.2.3 Retailer Information on the Bill

Despite any Service Agreement, a distributor shall, in respect of a low volume consumer that is served by a retailer:

- (a) include, on the part of each bill submitted to the low volume consumer that relates to the commodity price, the phrase “YOU ARE BUYING YOUR ELECTRICITY FROM”, followed by the retailer’s name in capital letters and the retailer’s telephone number, website address and e-mail address as provided by the retailer; and*
- (b) make available on the bill up to 500 text characters, including blank spaces, for the information set out in (a).*

Despite any Service Agreement, a retailer shall provide each applicable distributor with the retailer information listed in (a).

3. Section 10.5.2 of the Retail Settlement Code is amended by adding the words “or processed” to the end of paragraph 1.
4. Section 10.5.3 of the Retail Settlement Code is amended by adding the words “Subject to section 10.5.4A,” at the beginning of the second paragraph of that, and changing the “A” of the first word of that section to “a”.
5. Section 10.5 of the Retail Settlement Code is amended by adding the following new section 10.5.4A:

10.5.4A Notification of Transfer to Low Volume Consumer

Where a distributor processes an STR for a change in supply in respect of a low volume consumer under section 10.5.3 or 10.5.4, the distributor shall notify the low volume consumer of the transfer in writing within 5 business days of the date on

which processing of the STR has been completed. The notice must be sent to the low volume consumer separate from any other communication from the distributor, including the bill. Subject to any arrangements to the contrary that a distributor may have with a low volume consumer in relation to communications, the notice may be sent to the low volume consumer by courier, mail, facsimile or e-mail. The notice may not be given by telephone.

The notice must not include any promotional statements about the distributor's business or services, and must include the following:

- (a) the name of the competitive retailer to which the consumer was transferred;*
- (b) the date on which the transfer became effective;*
- (c) whether the low volume consumer will continue to receive a bill from the distributor that includes the price of the electricity commodity under distributor-consolidated billing or whether the low volume consumer will be billed using split billing or retailer-consolidated billing; including the date on which the distributor expects the low volume consumer to receive their first bill from the distributor under the new supply arrangement, and*
- (d) information about how to contact the distributor if the low volume consumer has questions about the transfer.*

Attachment D

Proposed Amendments to the Gas Distribution Access Rule

1. Section 1.2.1 of the Gas Distribution Access Rule is amended by adding the following new definition after the definition of “gas vendor consolidated billing”:

“low volume consumer” means a consumer who annually uses less than 50,000 cubic meters of gas or such other amount as may be prescribed for the purposes of section 2 of the Energy Consumer Protection Act, 2010;

2. Section 4.3 of the Gas Distribution Access Rule is amended by adding the following new sections 4.3.10 to 4.3.12:

4.3.10 Where a gas distributor processes an STR for a change in supply in respect of a low volume consumer under section 4.3.5 or 4.3.6, the gas distributor shall notify the low volume consumer of the transfer in writing within 5 business days of the date on which processing of the STR has been completed. The notice must:

- (a) be sent to the low volume consumer in accordance with section 4.3.1.12 and separate from any other communication from the gas distributor;*
- (b) include the information set out in 4.3.1.11; and*
- (c) not include any promotional statements about the gas distributor’s business or services.*

4.3.11 The notice referred to in section 4.3.10 must include:

- (a) the name of the gas vendor to which the consumer was transferred;*
- (b) the date on which the transfer became effective;*
- (c) whether the low volume consumer will continue to receive a bill from the gas distributor that includes the price of the gas commodity under gas distributor-consolidated billing or whether the low volume consumer will be billed using split billing or gas vendor-consolidated billing; including the date on which the gas distributor expects the low volume consumer to receive their first bill from the gas distributor under the new supply arrangement; and*
- (d) information about how to contact the gas distributor if the low volume consumer has questions about the transfer.*

4.3.12 Subject to any arrangements to the contrary that a gas distributor may have with a low volume consumer in relation to communications, the notice referred to in section 4.3.10 may be sent to the low volume consumer by

courier, mail, facsimile or e-mail. The notice may not be given by telephone.

3. Section 6 of the Gas Distribution Access Rule is amended by adding the following new sections 6.1.4 and 6.1.5:

- 6.1.4 *In the case of gas distributor-consolidated billing, and despite any Service Agreement, a gas distributor shall, in respect of a low volume consumer that is served by a gas vendor:*
- (a) include, on the part of each bill submitted to the low volume consumer that relates to the commodity price, the phrase “YOU ARE BUYING YOUR GAS FROM”, followed by the gas vendor’s name in capital letters and the gas vendor’s telephone number, website address and e-mail address as provided by the gas vendor; and*
 - (b) make available on the bill up to 500 text characters, including blank spaces, for the information set out in (a).*
- 6.1.5 *Despite any Service Agreement, a gas vendor shall provide each applicable gas distributor with the gas vendor information identified in section 6.1.4(a).*