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**VIA RESS, EMAIL and COURIER**

Ms. Kirsten Walli  
Ontario Energy Board  
2300 Yonge Street  
Suite 2700  
Toronto, Ontario  
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**Re: EB-2014-0158 Ontario Energy Board (the "Board")  
Energy Consumers Protection Act, 2010 ("ECPA") Review  
Enbridge Gas Distribution Inc. ("Enbridge") - Comments**

In accordance with the Board letter issued on October 23, 2014 for the above noted proceeding, please find a summary of our key points and the position of Enbridge:

- Enbridge will be an active participant at the Stakeholder Forum on December 8 and 9, 2014.
- Enbridge would agree with the Minister's letter at the outset of this process that there has been a dramatic decrease in complaints with regard to marketing and sales strategies employed by energy retailers since the introduction of the Energy Consumer Protection Act Part II.
- Enbridge notes, however, that the market penetration of mass market customers on contracts has continued to decline as well.
- Enbridge does not have specific comments on the series of questions put forward by the Board. While Enbridge generally agrees that the ECPA is functioning as designed and has reduced the number of complaints Enbridge is involved with between our customers and active Agents/Brokers/Marketers ("ABMs"), the review should examine whether the objectives of the ECPA have been met, including facilitation of a competitive market place.

There are a few specific issues Enbridge would like to see addressed that would better ensure consumer protection in this area:

- Transportation charges are an area which can cause customer confusion and make contract prices difficult to compare. Price comparisons on sales and marketing material should make clear whether contract rates are inclusive of transportation charges to ensure consumers are aware of how these costs will be treated and billed for.
- Enbridge also has concerns about the bundling of other services into fixed price natural gas or electricity contracts. Enbridge believes the scope to include other services within a fixed price commodity contract should be quite limited and not include charges for amounts beyond supply of either natural gas or electricity. This would help to ensure price evaluations that consumers make between energy retailers and utilities are relevant and directly comparable.
- While the ECPA has been quite effective in reducing the volume of complaints, Enbridge would like to see clearer communication of penalties and other sanctions available to the Board in cases where energy retailers are in breach of these rules. Consumers should have better access to information on past violations of these rules so they can make an informed decision on choosing a supplier for these critical services.

Please contact the undersigned if you have any questions.

Yours truly,

(Original signed)

Andrew Mandyam  
Director, Regulatory Affairs and Financial Performance