

January 11, 2016

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Box 2319
2300 Yonge St, 27th Floor
Toronto, ON M4P 1E4

Via Email: Boardsec@ontarioenergyboard.ca & Courier

Dear Ms. Walli:

Onit Energy Ltd Position on Records Retention/EB-2015-0247

Further to the Ontario Energy Board's Notice of Proposal regarding amending the Records Retention Period dated November 11th, 2015, and subsequent notice on December 10th, 2015, Onit's input is as follows:

- 1. Record Format:** Onit suggests that the format of the information may be paper-based or in electronic format. Based on the original format of the document requested, Retailers should have the option to provide either or type of documentation.
- 2. Confidentiality:** Onit, in discussions with other Retailers, would also require additional assurances that information requested after the current rule (4.2.2) "*A retailer shall maintain for a period of two years, or two years beyond the end of the contract for items...*" is extended, only be released to an OEB Investigator appointment (or similar individual) (OEB Act: 112.0.6 (1)). In doing so, Retailers will receive assurances that any and all documents will remain confidential and eliminate any dishonest consumers abusing the OEB complaint process in order to secure information for civil proceedings that would not normally be available.
- 3. Transition Period:** Onit would require a long lead time prior to implementation in order to ensure sufficient protocols and workflows are established to satisfy all components of EB-2015-0247.

Should you require additional information, please do not hesitate to contact me at 416-464-5350 or via email: david.balaban@owenergy.com or morley.shulman@owenergy.com.

Warmest regards,



David E. Balaban
President & COO, Onit Energy Ltd.

cc. Morley Shulman, Director Compliance and Customer Service