

Reply to the Attention of Julia C. Loney
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Our File No. 235486
Date December 2, 2016

DELIVERED VIA COURIER AND EMAIL

Ontario Energy Board
P.O Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Attention: Lou Mustillo and Veronica Mendes

Dear Mr. Mustillo and Ms. Mendes:

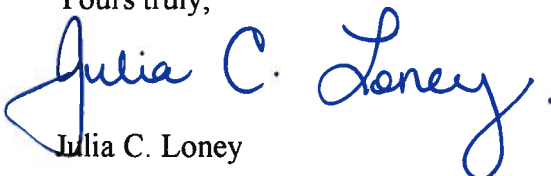
Re: XOOM Energy ONT, ULC (“XOOM”) Proposal for Online Verification Process

We are writing with respect to the Ontario Energy Board’s (“OEB”) letter dated November 4, 2016 regarding Consultation on Giving Effect to the Ontario Energy Board’s Report on the Effectiveness of the *Energy Consumer Protection Act, 2010*, Meeting to Discuss Online Verification (OEB File NO.: EB-2015-0268) (the “OEB Letter”).

According to the OEB Letter, the OEB notes that OEB staff would be interested in any additional proposals that energy retailers may wish to bring forward. Consequently, XOOM is pleased to submit the enclosed proposal of its online verification process for the OEB’s review and consideration. XOOM proposes to use this online verification process in its Ontario business and submits and requests that the OEB adopt rules around an online verification process for January 1, 2017 that would permit XOOM to use its proposed verification process as described in the enclosed proposal.

We trust that you will find the foregoing to be in order; however, please do not hesitate to contact the undersigned should you have any questions or concerns.

Yours truly,


Julia C. Loney

Thank you for providing an opportunity to submit a proposal for our online verification process in connection with the enabling of online verification as contemplated by the amended *Energy Consumer Protection Act, 2010*. In response to the Ontario Energy Board (OEB) letter on the subject dated November 4th, 2016, XOOM Energy ONT, ULC (“XOOM Energy”) is pleased to make this submission.

Our proposal is outlined below. Firstly, XOOM Energy proposes to use this verification process for its Ontario business. Secondly, XOOM Energy submits and requests that the OEB adopt rules for online verification for the January 1, 2017 effective date that would support XOOM Energy’s proposed online verification process as described below.

Our proposal identifies a process for online verification, along with suggested text for the body of the verification. Our process includes verification by a third party that can be emailed or texted to a consumer in order to verify their enrollment.

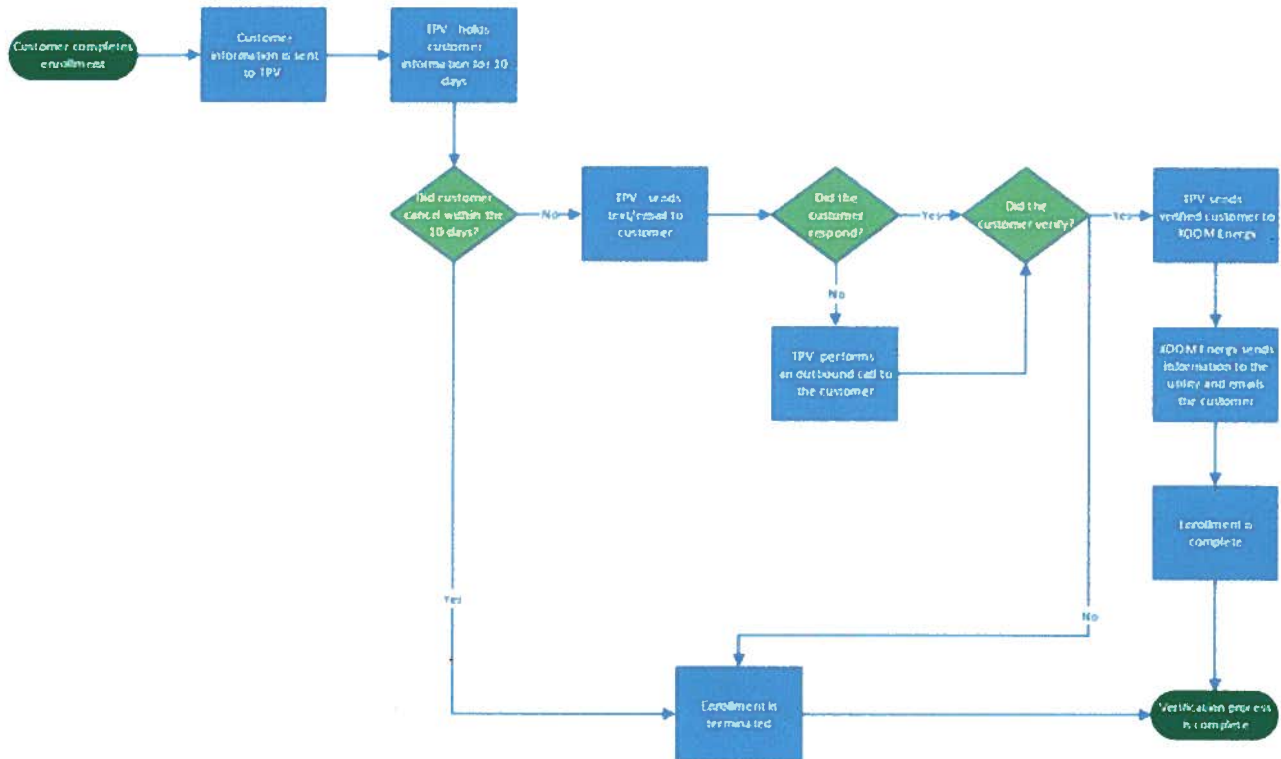
XOOM Energy’s Proposed Online Verification Process:

- The online verification process is completed by an automated system using an online third-party verification (TPV) software (the “TPV Service”). Remuneration/compensation to the third-party is for the provision of the TPV Service itself and is not determined, either directly or indirectly, on the number of contracts that are verified or the percentage of contracts that are verified.
- Currently, all enrollments are completed online through XOOM Energy’s website. A confirmation email is sent to the consumer immediately once they complete the enrollment process. The email includes all the relevant contract documents, being the terms and conditions, pricing and plan information, price comparison(s) and disclosure statement(s).
- Once the enrollment is completed, the consumer information will be sent to the TPV Service through a secured application program interface (API). The enrollment will be tagged with the time and date of the completion of the enrollment.
- The consumer information will be held by the TPV Service for 10 days from the date the consumer receives a copy of the contract in order to comply with the cooling-off period under the *Energy Consumer Protection Act, 2010*. During the verification window of 10 to 45 days from the date the consumer received a copy of the contract, an email and

SMS/text message will be sent to the consumer at their contact information provided. The TPV Service will attempt to send three (3) emails/text messages. If no response is received, the TPV Service will make an outbound phone call to the consumer to complete the verification.

- Once the consumer's enrollment has been verified, XOOM Energy will be notified by the TPV Service via an API and the enrollment will be sent to the applicable utility for acceptance.
- If a consumer cancels within the 10-day cooling-off period, XOOM Energy will notify the TPV Service through an API. The verification email and text message will not be sent to this consumer.
- If during the verification process, the consumer answers no to any regulatory statements, then the verification process is terminated in accordance with the *Energy Consumer Protection Act* or Ontario Regulation 389/10. The verification process will also be terminated if: (i) the consumer advises that XOOM Energy has committed an unfair practice; (ii) the TPV Service has reasonable grounds to believe that XOOM Energy has committed an unfair practice or has taken or is taking an unconscionable action; (iii) the consumer is not reasonably able to protect his or her interests by reason of inability to understand English; or (iv) the consumer is not comfortable with the verification process and text being recorded.
- If the verification process is successfully completed, the consumer is sent an email confirming that their enrollment with XOOM Energy is successful and the email includes an attachment of the verification.
- All attempts to reach the consumer will cease after 45 days from the enrollment date.

XOOM Energy and TPV Verification Process



Verification Text:

Thank you for your online enrollment for <<natural gas supply/ electricity supply /natural gas and electricity supply>> with XOOM Energy ONT, ULC. Please take a few moments to verify your online contract.

- Continue to Verification.
- I would like to terminate this verification and the contract.

Consent:

- I am comfortable for this verification service to proceed in English.

If yes, proceed to next question.

If no, verification service to ask if someone who speaks English can assist the consumer. If not, terminate the verification.

- I understand that my responses and information provided during this verification is being recorded for regulatory and quality control purposes.



*If yes, proceed to next question.
If no, terminate the verification.*

Verification:

Section 1: Your Contact Information (Information will be pre-populated with the consumer's information)

Name: <<inset consumer information from sign up>>

Billing Address: <<inset consumer information from sign up>>

Service Address: <<inset consumer information from sign up>>

- I confirm that the information above is accurate.
- The information above is inaccurate. (consumer can then correct information)

Section 2: Your Agreement Information

Utility: <<inset consumer information from sign up>>

Utility Account number: <<inset consumer information from sign up>>

Product and price selected: <<inset consumer information from sign up>>

- I confirm that the information above is accurate.
- The information above is inaccurate. (consumer can then correct information)

Section 3: Regulatory Questions

Consumer will need to answer the below statements by clicking on the affirmative/negative buttons. If the consumer answers in the negative, the verification process will be terminated.

- I am the account holder, the spouse of the account holder, or have been authorized by the account holder for the natural gas/electricity account.
- I recently entered into an <<natural gas supply/ electricity supply /natural gas and electricity supply>> contract with XOOM Energy ONT, ULC.
- We have to ask you some questions to confirm that you want to continue with the contract. Is it okay if we ask you those questions now?
- Today is <<date>>. Our records show that you received a copy of the contract documents by email, including all of the Terms and Conditions, on <<date>>. Is that correct?

If yes, and today's date is within 10 to 45 days of the date the consumer received the contract[s], proceed to next question.

If no, and/or today's date is outside of the 10 to 45-day verification window, terminate the verification.

- Did you receive and accept a copy of the Disclosure Statement? The Disclosure Statement explains basic information about energy contracts and your rights as a consumer.

If yes, proceed to next question.

If no, terminate the verification. If the consumer does not recall whether they received the documents, the verification service may offer to send a copy of the documents to the consumer by email or other means of delivery. The verification service may also ask the consumer if there is a convenient time to email/text again once the documents have been received by the consumer, but otherwise the verification must be terminated and the verification service must advise the consumer as follows:

"We are required to terminate the verification process at this time. A new verification process must be completed once you have received the documents".

- Did you receive and accept a copy of a Price Comparison explaining XOOM Energy ONT, ULC's price compared to the price from your utility?

If yes, proceed to next question.

If no, terminate the verification. If the consumer does not recall whether they received the documents, the verification service may offer to send a copy of the documents to the consumer by email or other means of delivery. The verification service may also ask the consumer if there is a convenient time to email/text again once the documents have been received by the consumer, but otherwise the verification must be terminated and the verification service must advise the consumer as follows:

"We are required to terminate the verification process at this time. A new verification process must be completed once you have received the documents".

- When I enrolled online, no company representative from XOOM Energy ONT, ULC was present.

If yes, proceed to next question.

If no, terminate the verification.

- We now have to ask you some questions to ensure you understand what you will be paying under the contract. Is it okay if we ask you those questions now?

- I understand that I will be purchasing my natural gas/electricity supply from XOOM Energy ONT, ULC.

- I understand that I will pay XOOM Energy ONT, ULC's contract price of [xx] cents per cubic meter for natural gas or [xx] cents per kWh for electricity for a term of [x] years.

- I understand that there is no guarantee that I will save money on my natural gas and/or electricity bills during the contract period.

- I understand that I will continue to pay my utility for delivery and transportation charges (unless transportation and/or storage are included in the contract price) as well as all applicable taxes. I also understand that I will be responsible for paying my share of the Global Adjustment (for electricity only).

If yes, proceed to next question.

If no, verification service to explain contract is only for the supply of natural gas and electricity and the consumer will continue to pay delivery charges, applicable taxes, and Global Adjustment on his/her electricity bills and taxes.

If consumer asks about Global Adjustment: Most electricity generating companies are paid either a rate set by the Ontario Energy Board or a contract rate negotiated with, or set by, the Independent Electricity System Operator. The Global Adjustment is the difference between these contracted or regulated rates and the money the generators earn in the wholesale marketplace. The Global Adjustment also covers the costs of some conservation programs. The Global Adjustment is calculated each month, and can change every month. Although it can be a credit, the Global Adjustment has been a charge in almost every month since 2006. All electricity consumers have to pay their share of the Global Adjustment. The electricity prices offered by your utility already include an estimate of the Global Adjustment. If you switch to a retailer, you will have to pay your share of the Global Adjustment in addition to the contract price. And you will start to see the Global Adjustment as a separate line item on your electricity bill.

- I understand that I may cancel my contract with XOOM Energy ONT, ULC at any time up to 30 days after I receive my second bill under the contract without paying a cancellation fee. I also understand that I can cancel my contract at any time after that but that I might have to pay a cancellation fee.

If yes, proceed to next question.

If no, verification service to explain that these details are specified in the terms and conditions of the contract.

- I accept these terms of my contract.

If yes, proceed to next question.

If no, terminate the verification.

- I confirm that I want to continue with my contract and would like to proceed with the purchase of <<natural gas supply/ electricity supply /natural gas and electricity supply>> from XOOM Energy ONT, ULC.

If yes, proceed to closing.

If no, because the consumer wants more time to make a final decision on their natural gas/electricity contract(s), the verification service may ask if there is a convenient time to message/text back but otherwise the verification service must be terminated. Where there is one contract for natural gas and another for electricity and the consumer wishes to delay a decision on only one contract, the verification service may continue with confirmation of the accepted contract.

If no, because the consumer does not want to verify the contract[s], the verification service may thank the consumer for their time but otherwise the verification service must be terminated and



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the verification service must inform XOOM of the consumer's choice not to verify the contract[s]. Where there is one contract for natural gas and another for electricity and the consumer states that they do not wish to verify one of the contracts the verification service may continue with confirmation of the accepted contract and must inform XOOM of the consumer's choice not to verify the other contract.

You can get more information from the Ontario Energy Board. Would you like the Ontario Energy Board's website address or toll-free number?

*If **yes**, provide information.*

*If **no**, proceed to closing.*

Now that you have confirmed that you want to continue this contract, your natural gas utility and/or electricity utility will each send you a letter after the transfer has been done. The letters will tell you when you will start to pay the contract price for your <<natural gas supply/ electricity supply /natural gas and electricity supply>>. XOOM Energy's name and telephone number will start to appear on your [natural gas /electricity] bill normally within 120 days. Please call that number if you have questions.

Thank you.

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