



December 6th, 2016

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

Dear Ms. Walli,

RE: Issuance of Revised Proposed Consumer Facing Materials
OEB File No.: EB-2015-0268

ONIT Energy has assessed the proposed Consumer Facing Materials and offer the following comments:

Dual Fuel Disclosure Statement

Onit supports the Dual Fuel Disclosure Statement as it eliminates multiple customer signatures. Our concern centers on the negative wording which may cause unnecessary alarm and fear. "You Don't Have to..." and "Do Your Homework" are pejorative in nature and may negatively influence a potential customer.

Onit believes the current regulatory instruments do an excellent job of protecting and educating the consumer. In addition to having a 10-day cooling-off period (which is stated on page 2), the consumer must now also verify their contract if they wish to proceed with enrollment.

Further, the dual fuel version states, on the same page, that the consumer may cancel their contract within 30 days of receiving their second bill. This only applies to electricity contracts (Section 21(d)(ii) of the Ontario Regulation 389/10) and should be clearly stated.

Price Comparison

Onit supports the proposed Price Comparison templates. They are easier for the consumer to read and understand. We respectfully ask the Board to consider removing the wording below Table B (see Appendix 'A') where it says, "***This price is not regulated by the OEB***", in addition to where it states, "***it has not been reviewed or approved by the OEB***" (under "Description of Contract Price Offer"). The wording, in its current form, could mistakenly cause the consumer to question the legality of the document. With respect to both residential and non-residential Price Comparisons, there is a section entitled, "***Time-Of-Use Pricing***" (Appendix 'B') that illustrates an incorrect pricing pattern of 65% off-peak, 17% mid-peak and 18% on-peak. This may be fine for residential consumers but does not accurately reflect a commercial establishment. Our business clientele typically uses 70% on-peak, 20% off-peak and 10% mid-peak. We therefore suggest removing it from the non-residential Price Comparison template or update it to more accurately reflect business consumers. In addition, while the proposed Price Comparison template is ideally suited towards fixed-rate products, we request the flexibility to insert **variable** pricing should our clients so choose.



Ontario Wholesale Energy
GAS & ELECTRIC

2 Bloor Street West, Suite 700
Toronto ON M4W 3R1

1.844.604.7283 (Toll Free)
T 647.435.6621
F 1.855.378.7711
E info@ontariowholesaleenergy.com

Summary

Onit Energy is, as always, committed to working with the OEB to enhance consumer protection. We believe that many of the measures in place by January 1st will benefit not only the consumer, but retailers/marketers as well. By eliminating some of the negative and redundant wording, we feel that this will better serve the consumer by further reducing any confusion.

Sincerely,

Morley Shulman
Director, Compliance & Customer Service

Energy Solutions for a Greener Tomorrow.

ontariowholesaleenergy.com