



**Ontario Energy
Association**

August 12, 2010

Mr. Alex Killoch
Director, Planning and Economics Branch
Regulatory Affairs and Strategic Planning Division
Ministry of Energy and Infrastructure
900 Bay Street
Mowat Block, 5th Floor
Toronto, Ontario
M7A 2E3

Dear Mr. Killoch:

I am writing with regard to the proposed regulations under the *Energy Consumer Protection Act, 2010*.

The Ontario Energy Association (OEA) supports effective consumer protection, and we are pleased that the Act incorporates many of the elements developed and proposed by some of our retailer and marketer member companies.

We are concerned, however, that the proposed regulations apply inconsistently to the renewal of energy contracts. Specifically, Section 14 states that contracts for natural gas may be renewed automatically, subject to certain conditions, but does not make the same provision for electricity contracts. We believe that for the purposes of renewing or exiting contracts, there is no need or compelling reason to treat these commodities as fundamentally different, and that automatic contract renewal should be permitted for both.

We recommend, therefore, that the proposed regulation be amended to allow contracts for both natural gas and electricity to be renewed automatically on a month-to-month basis and subject to penalty-free exits. As the OEA and its marketer and retailer member companies have stated previously, a month-to-month automatic renewal framework incorporating penalty-free exits would provide customer convenience and strong consumer protection, and help reduce consumer confusion.

Thank you for the opportunity to provide input. Should you wish to discuss this recommendation further, please do not hesitate to contact me at either (416) 961-2339 ext. 227 or eherzig@energyontario.ca.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elise Herzig", is written over a light blue circular stamp.

Elise Herzig
President and Chief Executive Officer