

August 22, 2016

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

Dear Ms. Walli:

**Re: EB-2015-0363: Cap and Trade Framework for Natural Gas Utilities  
Early Determination regarding Billing of Cap and Trade Related Costs and  
Customer Outreach**

On behalf of the Ontario Energy Association (OEA), I am writing in response to the Ontario Energy Board (OEB) early determination that cap and trade program costs will be included within the Delivery Charge on natural gas bills.

The OEA is very disappointed that the OEB decision did not reflect the virtually unanimous feedback it received to its discussion paper that cap and trade costs should be transparent and readily visible to the consumer. The broad-based consensus that there should be a separate line item is reflected in the range of submissions received by the OEB from participants. In addition, the OEA believes there is no justification for the burying of cap and trade costs within the Delivery line on natural gas bills: these costs have nothing to do with delivery, and therefore will add to consumer confusion and decrease transparency about costs.

The OEA supports the Industrial Gas Users Association (IGUA) August 15 request to the OEB for:

1. further detail on the "information on cap and trade" which the Board has indicated the utilities will be required to include in the description section of monthly customer bills (as indicated in the 3rd paragraph on page 6 of the Determination); and
2. reasons why blending cap and trade compliance costs in the current delivery charge line of gas customer bills is the better option for presentation to customers, and recovery, of such costs.

In addition, the OEA would like to reiterate its recommendation to you in its June 22<sup>nd</sup> letter that the costs of cap and trade be shown as a separate line item on the utility bill. We ask that you reconsider this early determination.

As Ontario's energy voice, the OEA represents Ontario's energy leaders and corporate members that span the full diversity of the energy industry. This diversity allows us to offer a broad and comprehensive perspective on a cap and trade regulatory framework.

Please feel free to contact me if there are any questions or requirements for clarification.

Sincerely,



Vince Brescia  
President & CEO  
Ontario Energy Association