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Delivered by E-Mail and Courier

April 13, 2006

Mr. John Zych
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Suite 2700
Toronto, Ontario
M4P 1E4

Dear Mr. Zych:

RE: RP-2004-0205
Proposed Amendment to the Standard Supply Service Code

Aegent Energy Advisors Inc. (Aegent) is in receipt of the Ontario Energy Board's March 24, 2006 Notice of Amendments to the Standard Supply Service Code (SSS Code) and the Notice of Proposal to Amend the SSS Code. With respect to the proposed amendment concerning the imposition of the Regulated Price Plan Settlement when a customer moves from one distributor to another while on a retail contract, Aegent would like to bring to the Board's attention another set of circumstances that results in the potential for the RPP Settlement to be applied inappropriately.

Aegent is a consulting firm providing analysis and advice to large energy users to reduce the cost and manage the risk associated with their energy purchases. Aegent does not produce or sell energy. Some of Aegent's clients are electricity consumers who currently fall into the category of "designated consumers". Aegent has been assisting these consumers in pursuing options to lower their electricity costs and manage their price risk by opting out of the RPP and enrolling with an electricity retailer. Some of these customers are school boards.

Recently, some school boards have been experiencing a situation where accounts that were enrolled with an electricity retailer have been removed from the retail arrangements by the electricity distributor and placed on the RPP. It appears that the reason for the 'de-enrollment' and the transfer to the RPP is a direct result of the distributor deciding to replace the meters at the corresponding locations. The outcome has been that to return the affected accounts to the retail arrangement, the school boards must again exit the RPP for the accounts in question and 're-enroll' them with the retailer, thereby potentially prompting the imposition of an RPP Settlement amount for the period of time that the account was subject to the RPP (or in the extreme, an RPP Settlement amount based on a full year's consumption). A second outcome is that the consumer foregoes the cost benefits of the retail contract for the time the account is back on the RPP.

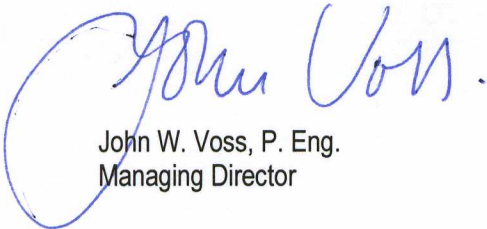
In Aegent's view, this is another technical process issue that is beyond the control of the consumer and yet potentially results in additional costs for the consumer on a retail contract. The replacement of the meters is

a distributor-initiated action and therefore, the consumer should be unharmed by the action from the perspective of their energy commodity costs. The distributor would know that a particular meter point is enrolled in a retail arrangement and consequently, that information should remain attached to the meter point with the installation of the new meter, eliminating the need to put the account back on the RPP even for a short period of time. However, should the distributor's processes be such that a temporary return to the RPP is unavoidable, then it would be reasonable to expect that the consumer should be kept whole as far as the customer's commodity costs are concerned. This would mean refunding or charging any RPP Settlement amount to the consumer that was incurred when the meter point was removed from the RPP and returned to the retail arrangement. It also means taking the necessary steps to ensure that for the period the consumer was temporarily on the RPP, the customer's commodity costs are exactly what they would have been under the retail contract, including applicable credits and rebates, had the distributor not replaced the meter. If this is not possible, then at a minimum the consumer's commodity costs should reflect the spot price and applicable credits and rebates.

Aegent is uncertain as to whether this set of circumstances warrants another amendment to the SSS Code, an information bulletin to affected market participants, or some other means of addressing the issue. The Board may be in the best position to make this determination. However, Aegent does believe that it is an issue that requires attention from the appropriate parties.

Aegent appreciates the opportunity to provide its input to the Ontario Energy Board. Should you have questions, please contact either me (416.622.9449, x102; jvoss@aegent.ca) or Bruce Sharp, Senior Consultant (416.622.9449, x112; bsharp@aegent.ca).

Yours truly,



John W. Voss, P. Eng.
Managing Director