



2006-04-11

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

Dear Mr. Zych:

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

In response to the Board's invitation for comments on the proposed amendment to the Standard Supply Service Code relating to situations when a consumer on a retail contract moves within Ontario, please find our comments listed below.

The Board has identified two alternatives for addressing the handling of the RPP Settlement Amount. The first alternative is to refund the RPP Settlement amount (within a 3 month period) where the distributor is notified by a consumer that they had an existing retail contract before they moved and are remaining on that contract. The proposed amendment further requires that Distributors confirm this information with the applicable Retailer. Our suggestion is to have the consumer's Retail Service Provider contact the Distributor upon notice that the consumer is moving and wishes to retain their contract with the Retailer. A standard form should be devised and used to gather the appropriate information and to maintain consistency of information being forwarded to Distributors. This suggested method of having the Retail Service Provider notify the Distributor, will alleviate any missed moves involving existing retailer contracts and lessens the amount of additional administrative burden on Distributors in having to confirm each enrol to determine whether the consumer was contracted with a Retailer in the province previously.

Going forward, it is suggested that an EBT transaction be implemented to handle the communication of consumers contracted with a Retailer moving from one location to another within the province of Ontario. The Enrol Request Transaction could be modified to include a flag from the Retailer indicating not to charge the

RPP Settlement Amount in instances where the criteria apply. This would alleviate the need for alternative 2, which is to delay the application of the RPP Settlement Amount until after the retail enrolment process. Also, the delay of application of the RPP Settlement Amount may not be possible in some cases where LDC's have automated the process to apply the RPP Settlement Variance where applicable.

Thank you for the opportunity to comment. Should you have any questions on the above comments, please do not hesitate to contact me.

Yours truly,

ENWIN Powerlines Ltd.

Original signed by G. Gesuale

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