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Board Secretary  
Ontario Energy Board  
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April 13, 2006

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

We are writing to comment on the proposed amendment to the Standard Supply Service Code adding section 3.7.4.

While we recognize and agree that customers who move, but remain under an existing retailer contract are being unfairly treated through the current mechanism for application of the RPP True-up, we are concerned that as worded, this section places undue burden on the distributor to administer retail contracts.

As the retailer is the only party which knows the customer contractual obligations as it relates to a move within the province, we recommend that the notification of an existing contract come from the retailer.

We would recommend implementing a two part approach:

- 1) The long term solution would be a change to the EBT Standards where a new flag is set within the Enroll Request indicating a new customer contract or an existing customer contract. Based on the setting of this flag, the new LDC would know whether or not to assess the RPP True-up when the customer switches to the retailer, and systems could be programmed to handle this automatically based on that flag.
- 2) In the interim, we would recommend that the retailer use a CSV file sending this information, as was done to notify distributors of 'Post December 9th Enrolls' prior to implementation of EBT standards v3.1. This file could be sent to utilities on a weekly basis to communicate any enrolls which relate to existing contracts so the RPP True-Up would not be assessed.

We appreciate the opportunity to provide our input into this proposed code amendment.

Regards,

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