

## Briefing Note

### Hydro Ottawa seeks alternative on-bill messaging authorized by the Minister

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#### Issue:

Hydro Ottawa Ltd. (“Hydro Ottawa”) has requested the Minister’s authorization to use shortened versions of Ontario’s Fair Hydro Plan (OFHP) on-bill messaging for French and English invoices as the messages required by regulation exceed the character limitations of their billing system.

#### Context:

- As of July 1, 2017, s. 1 of O. Reg. 196/17 (Invoicing Requirements) made under *Ontario’s Fair Hydro Plan Act*, 2017, requires electricity vendors and unit sub-meter providers (USMPs) to include the following statement on English and French invoices, respectively, in a location where conservation or other utility messages to consumers are usually placed.

#### English on-bill message:

Ontario’s Fair Hydro Plan substantially lowers electricity bills for typical residential consumers. This includes the eight per cent rebate introduced in January 2017, and builds on previous initiatives to deliver broad-based relief on all electricity bills.

#### French on-bill message:

Le Plan ontarien pour des frais d’électricité équitables réduit considérablement les factures d’électricité du consommateur résidentiel moyen. Il inclut la remise de 8 % instaurée en janvier 2017 et mise sur les initiatives antérieures visant à alléger globalement toutes les factures d’électricité.

- Under s. 3 of O. Reg. 197/16, electricity vendors and USMPs can seek an alternative to the wording and/or invoicing process required by the regulation by submitting a written request to the Minister, outlining the technical and/or operational reasons why they are unable to comply with the specified requirements, and outlining a proposed alternative.
- If the Minister is satisfied that it would be impossible, impractical or unreasonably difficult for an electricity vendor or USMP to use the specified wording, or to follow an invoicing process required by the regulation, the Minister can provide a different wording or an alternative invoicing process for the vendor or USMP to follow via written notice.
- If the electricity vendor or USMP receives written notice from the Minister (via a letter), per s. 3(2), they are required to use the wording or follow the invoicing

process specified in the letter instead of the wording or invoicing process stated in the regulation.

### **Request from Hydro Ottawa:**

- On June 14, 2017, Hydro Ottawa submitted a letter to the Ministry requesting authorization to use alternative on-bill messaging on account of character space limitations. They indicate the on-bill messaging required by the regulation exceeded their 253-character limitation by eight characters for English invoices, and 46 characters for French invoices.
- Alternatively, Hydro Ottawa has requested authorization from the Minister to use the following on-bill messages, which have been condensed to fit within their character limitations, but do not alter the intended meaning of the messages:

#### Proposed English on-bill message:

Ontario's Fair Hydro Plan substantially lowers electricity bills for typical residential consumers. This includes the 8% rebate introduced in January 2017, and builds on previous initiatives to deliver broad-based relief on all electricity bills.

#### Proposed French on-bill message:

Le Plan ontarien pour des frais d'électricité équitables réduit nettement la facture des clients résidentiels. Il inclut le rabais de 8% instauré en janvier 2017 et repose sur des initiatives visant à alléger toutes les factures d'électricité.

- Hydro Ottawa indicates they require a response from the Minister by June 23, 2017 to ensure timely compliance with the Ministry's OFHP messaging requirements.

### **Recommendation:**

- The Ministry recommends granting Hydro Ottawa's request to include alternative on-bill messaging. Hydro Ottawa's proposed alternatives do not substantially alter the wording of the on-bill messaging, nor do they affect the meaning.
- Authorization of this request will ensure Hydro Ottawa is able to comply with the regulatory invoicing requirements on-time and will not incur additional expense in doing so.

Date Prepared: June 20, 2017