

Briefing Note

Enercare seeks alternative on-bill Ontario's Fair Hydro Plan (OFHP) messaging authorized by the Minister

Issue:

The unit sub-meter provider (USMP), Enercare Connections Inc. ("Enercare"), has requested the Minister's authorization to use a shortened version of the Ontario's Fair Hydro Plan (OFHP) on-bill messaging for English invoices as the current message exceeds their character limitation.

Context:

- As of July 1, 2017, s. 1 of O. Reg. 196/17 (Invoicing Requirements) ("the Regulation") made under *Ontario's Fair Hydro Plan Act, 2017*, requires USMPs to include the following statement on invoices 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.

- Under s. 3 of the Regulation, USMPs can seek an alternative to the required wording and/or invoicing process by submitting a written request to the Minister, outlining the technical and/or operational reasons why they are unable to comply, and providing a proposed alternative.
- If the Minister is satisfied that it would be impossible, impractical or unreasonably difficult for the USMP to use the specified wording, or to follow an invoicing process required by the Regulation, the Minister can provide different wording or an alternative invoicing process for the USMP to follow via written notice.
- If the USMP receives written notice from the Minister authorizing their request, as per s. 3(2) of the Regulation, 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 Enercare:

- On June 20, 2017, Enercare sent a letter to the Minister requesting authorization to use an alternative on-bill message on account of character space limitations. In their request, they indicate the required on-bill message for English invoices exceeds their character limitation by three characters (257 characters, with spaces, instead of

254). No request was made with respect to the on-bill message for French invoices (presumably this USMP does not issue French invoices).

- Instead, Enercare proposes to use the following on-bill message for English invoices, which has been shortened to fit the character limitations of their third party billing software, but does not alter the meaning of the message:

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.

- Due to internal operational deadlines, Enercare indicates they require a response by June 23, 2017 in order to print messages on July invoices.

Recommendation:

- The Ministry recommends granting Enercare's request to include alternative on-bill messaging.
- Enercare's proposed alternative does not substantially alter the wording of the on-bill messaging (replaces "eight per cent" with "8%"), nor does it affect the meaning.
- Authorization of this request will ensure Enercare is able to comply with the regulatory invoicing requirements on-time and will not incur additional expense in doing so.

Date Prepared: June 21, 2017