

Ontario Rebate for Electricity Consumers Invoicing Regulation (O.Reg. 364/16) Exemption Request from the IESO

ISSUE:

- The IESO has requested an exemption from clauses 2(1) 1., 2(1) 3. and 2(1) 4., of Ontario Regulation 364/16 – Invoicing Requirements. The IESO believes that for technical or operational reasons, it would be impractical or unreasonably difficult to meet certain invoicing processes and invoice wording requirements set out in the Regulation.

RECOMMENDATION:

- To provide the exemption to the IESO by way of a formal Minister's notice, granting the alternative invoicing process and invoice wording listed in the appended table. (Appendix 1)

KEY INFORMATION:

Reasons for Exemption

- The IESO predicts that it will cost approximately \$40,000 and 400 person-hours to update their current systems to accommodate the Regulation requirements in clauses 2(1) 1., 2(1) 3. and 2(1) 4 (see Appendix 1).
- There is currently only one OREC-qualifying IESO customer in which the invoicing regulations would apply.

Clause	Detailed rationale for exemption
2(1) 1.	The IESO's current invoicing processes only permit charge types to print in numerical order and therefore the OREC line item would not appear in the location required by that clause. Instead, the line item would appear towards the bottom of the invoice and before the Ontario Clean Energy Benefit and the IESO Administration Charge.
2(1) 3.	The IESO's current invoicing processes can only generate charge types in all caps font and in naming convention similar to other comparable charges.
2(1) 4.	The IESO's current invoicing processes could only print the wording required by the clause on all invoices for all market participants and not just on those invoices issued to OREC-eligible accounts. The current language requirement is not applicable to all IESO market participants who receive invoices.

Comparison and Proposed Alternatives

- The IESO has proposed alternative invoice language and invoicing processes detailed in Appendix 1 below. The IESO believes the proposed alternatives will promote the original purposes of the Regulation, without the IESO incurring additional costs.

Appendix 1 – Comparison of Requested Changes

Clause	Original Requirement	Proposed Alternative
2(1) 1.	The total amount of the credited financial assistance for the billing period and, if applicable, the amount of any credits for financial assistance for previous billing periods that were not provided in previous billing periods, must be clearly shown as a line item on the face of the invoice at an appropriate location below the itemized charges for electricity, delivery, regulatory charges, debt retirement charge and harmonized sales tax and below any line item related to financial assistance under the Ontario Electricity Support Program, but above the net amount of the invoice after deducting the credit.	To print the OREC related charge type in numerical order.
2(1) 3.	The credit must be labelled as follows: “8% Provincial Rebate”.	To label the OREC credit as “ONTARIO REBATE FOR ELECTRICITY CONSUMERS (8% PROVINCIAL REBATE) SETTLEMENT AMOUNT”
2(1) 4.	The invoice must set out, in a location where conservation or other utility messages to consumers are usually placed, the following statement: “The Ontario government is providing a rebate on your electricity costs equal to the provincial portion of HST”.	To set out the following statement: “The Ontario government is providing eligible consumers with a rebate on their electricity costs equal to the provincial portion of HST”.