

September 2, 2016

Via: email to secretariat@regie-energie.qc.ca

Ms. Véronique Dubois
Secrétaire pour la Régie de l'énergie
Tour de la Bourse, C.P. 001
800, Place Victoria, 2e étage, bureau 255
Montréal (Qc) H4Z 1A2

Dear Ms. Dubois:

RE: Case 2017, R-3970-2016: Demande de modification du processus d'adhésion dans une entente de fourniture à prix fixe: Gaz Metro's Proposed Positive Confirmation Process

With respect to the positive confirmation process proposed by Gaz Metro Limited Partnership in Rate Case 2017, R-3970-2016, Just Energy Quebec L.P. /Juste Energie Quebec S.E.C. ("Just Energy") provides the following response. Just Energy believes it is in the best interest of business consumers, government and industry to work collaboratively in an effort to ensure the interests of business consumers are protected, Gaz Metro achieves its objectives, and business is not unduly restricted.

Just Energy is supportive of the intended purpose of Gaz Metro's positive accession process, but has concerns regarding its necessity and fairness. Just Energy is of the view that the current accession process which is to automatically grant a consumer's request to participate in the natural gas fixed price service if cancellation is not received is sufficient. Gaz Metro proposes the cancellation of a natural gas fixed price agreement signed by a business consumer be cancelled unless said consumer takes an additional step to remit an enrollment confirmation coupon to Gaz Metro. Just Energy submits that this proposal is counterintuitive and unnecessary for business consumers.

The proposed process is inconvenient for business consumers and, if approved, would create a barrier to their access of alternative fixed-price energy product offerings and affect the retailing of energy contracts and consumer choice. Just Energy suspects that a significant number of business consumers will not take the step to remit the coupon to Gaz Metro, not because they do not want the service they previously signed for, but because they are operating a business and the process is inconvenient.

Just Energy submits that it is counterintuitive to require a business consumer who; a) has signed a contract that sets out in plain language their rights and obligations; and b) who has subsequently confirmed their understanding of essential details of said contract, to take additional steps that would allow them to receive the benefit of the product they've previously agreed to. By virtue of operating a business, business consumers would have had to have

entered into binding agreements for other business services. It is our view that, business consumers would not be pleased that Gaz Metro, through the approval of the government, is second-guessing their decision to choose an energy solution that works for them.

Just Energy remains committed to consumer protection which is why we use plain language contracts, conduct verification calls after said contracts are signed and have controls in place to ensure our sales representatives are clear and accurate in their presentations with respect to the nature and purpose of their visit and product features. We note that Just Energy received one complaint since January 2016. In light of Just Energy's processes and low levels of consumer complaints, we do not agree that the solution to consumers not understanding the scope and commitment to the service offered by natural gas suppliers, as alleged by Gaz Metro, is to create a barrier to consumer choice.

Just Energy is committed to supporting Gaz Metro's goal of enhanced consumer protection and believes that an alternate solution can be devised to meet this goal, while continuing to allow consumers to choose the best products that meet their needs.

Just Energy would like an opportunity to discuss with Gaz Metro and the Régie de l'énergie current best practices for the marketing and advertising of energy retail services. Because we operate in numerous jurisdictions across North America, we have the ability to provide advice and put forth recommendations to Gaz Metro.

We hope that this input is recognized and supported by Gaz Metro and the Régie de l'énergie. Thank you for your consideration and attention. We look forward to your response.

Should you have any questions, please do not hesitate to contact Nola Ruzycki at 403.462.4299 or nruzycki@justenergy.com or Frances Murray at 905.461.2360 or fmurray@justenergy.com.

Sincerely,



Nola Ruzycki
Vice President, Regulatory Affairs



Frances Murray
Manager, Regulatory Affairs

c.c. Gaz Metro. JSHuet@GazMetro.com