



June 24, 2016

Mr. Mike Nozdryn-Plotnicki
Senior Advisor
Market Surveillance Administrator
#500, 400-5th Avenue SW,
Calgary, AB T2P 0L6

Dear Mr. Nozdryn-Plotnicki

Re: Comments on the MSA Publication of Retail Market Data

Direct Energy (DE) has the following comments regarding the information contained in the MSA document, *Publication of Retail Market Data*, dated June 8th, 2016.

1. **Time step for the data:** DE is not comfortable with the granularity that monthly data would provide to retailers in terms of visibility into the sales strategies of their competitors. DE is comfortable with quarterly data, which would provide good information on trends, but not disclose specific regional sales strategies month-by-month.
2. **The degree of precision of the data to be posted:** DERS would prefer that the data be less precise, perhaps through the use of pie charts or something similar.
3. **The delay before posting the data:** DE would prefer that the information be released on a longer time lag than suggested, such as one year. This would mean that data could be refreshed quarterly, but the sales strategies of the retailers would be stale by the time the information was released to the market.
4. **The minimum threshold in size of firms:** For fairness in the treatment of all market retailers, the names of all retailers should be disclosed.
5. **The inclusion of all consumer classes:** DE would prefer that all consumer classes be included. DE finds this information helpful.
6. **Combining various small electricity zones:** DE would prefer if the small electricity zones were grouped in geographic zones, based on proximity.

Please contact the undersigned if you have any questions.

Yours sincerely,

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