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October 9, 2014

VIA COURIER & E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario
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Dear Ms. Walli:

**Re: Policy Review of Electricity and Natural Gas Distributors' Residential Customer Billing Practices and Performance
Comments of Enbridge Gas Distribution Inc. ("Enbridge")
Ontario Energy Board No. EB-2014-0198**

Enbridge is providing these comments in reference to the EB-2014-0198 Draft Report of the Board regarding Electricity and Natural Gas Distributors' Residential Customer Billing Practices and Performance issued by the Board on September 18, 2014.

Enbridge is satisfied with the report recommendations and that are no necessary additional requirements of the Gas Distributors at this time. If in the future the Board were to contemplate any changes to the Natural Gas Distributors residential customer billing practices and performance, we would recommend a comprehensive review and consultation process to ensure an analysis of the benefits versus potential cost implications.

While the recommended future requirements and related questions in the current Draft Report relate to Electricity Distributors, we provide the following comments as in relation to Enbridge's circumstances.

Enbridge believes that its current billing practices of monthly billing with actual reads every two months has a number of important checks and balances to ensure accurate billing such as: (1) the current Consecutive Estimates SQI (< 0.5% of meters with no read for 4 consecutive months) in place for natural gas distribution utilities ensures that customers do not experience prolonged periods of consecutive estimates; (2) Enbridge's CIS platform has an estimation logic to ensure consumption accurately takes into account the customer's consumption history; and, (3) we also strongly encourage

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our customers to join our Budget Billing Plan (“BBP”) which is an important mechanism for customers to balance out their consumption and any minor variations that may come from an estimated versus actual meter reading. Currently, half of our residential customer-base is on BBP.

In future circumstances where the Board were to require the adoption of monthly actual meter reads of Enbridge, it would require Enbridge to double its annual O&M meter reading costs, which are currently approximately \$10M. This increased cost has not been contemplated in Enbridge’s current 2014-2018 IR plan and we believe would be an appropriate consideration by the Board in reaching any such determination. While there may be a small reduction in inquiries related to the accuracy of estimated reads, this reduction would not offset the increased O&M investment to move to monthly actual reads.

Enbridge continues to review the business case for Automatic Meter Reading (“AMR”) of natural gas meters. While we are hopeful that costs of AMR will or could decrease as the technology matures, currently AMR is extremely capital intensive and not financially feasible.

Please contact the undersigned if you have any questions.

Yours truly,

(Original Signed)

Kevin Culbert
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