



October 14, 2014

BY EMAIL/RESS

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON
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Dear Ms. Walli,

RE: Whitby Hydro Electric Corporation

Policy Review of Electricity and Natural Gas Distributors' Residential Customer Billing Practices and Performance (EB-2014-0198)

On September 18, 2014 the Ontario Energy Board issued its Draft Report of the Board on Residential Billing Practices and Performance of Electricity and Natural Gas Distributors (the "Draft Report") and provided an invitation for parties to submit comments.

With regards to the survey results included in the Draft Report, Whitby Hydro Electric Corporation ("Whitby Hydro") advises the Board of the following clarifications:

- Table 1 portrays Whitby Hydro as one of the electricity distributors that "plans to switch to monthly billing". To clarify, Whitby Hydro's response to the survey advised the Board that it had previously considered moving to monthly billing and plans to re-examine this option in the upcoming year. Whitby Hydro also indicated that consideration of items such as costs and benefits would be important in its decision making process. At the time of completing the survey, there had been no final decision made to move to monthly billing.
- The notation in Table 1 incorrectly identifies Whitby Hydro as one of the electricity distributors that has a small number of residential customers that are billed on a monthly basis. Whitby Hydro's residential customers are all currently billed on a bi-monthly basis.

Whitby Hydro participates in the Electricity Distributor's Association ("EDA") regulatory council and has provided input through the EDA on its submission.

Whitby Hydro suggests that it is premature to mandate monthly billing without adequate analysis, consultation and customer engagement. If however, monthly billing becomes a requirement, all electricity distributors should be given sufficient time to implement and

allowed to recover additional costs incurred (both one-time and on-going). Given the changes to billing system, resource requirements, processes etc., a lead-time of 8 -12 months would be considered appropriate.

With respect to estimated billing, Whitby Hydro agrees that estimated billing is not ideal for either the electricity distributor or the customer; however, there are circumstances where estimated billing is reasonable and appropriate. Some examples would include meter access or meter equipment/communication issues which would otherwise delay billing beyond a reasonable time. As a result, Whitby Hydro does not support the complete elimination of estimated billing. While reporting is not currently available and further learning and evolution is expected over time, the new billing accuracy measure may serve to apply appropriate pressure to keep the use of estimated billing at low levels. When an estimated bill is required, Whitby Hydro believes that electricity distributors should be allowed to determine a reasonable approach for estimating based on the information and systems available.

Regards,

Original Signed By

Susan Reffle
Vice-President