



February 19, 2015

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Proposed Amendments to the Distribution System Code
Consumer Billing Practices and Performance, EB-2014-0198**

On February 5, 2015, the Ontario Energy Board (the “Board”) posted its proposed amendments to the Distribution System Code (“DSC”) in relation to billing frequency, the use of estimated billing and billing accuracy. Oakville Hydro appreciates the opportunity to provide comments on the proposed amendments to the DSC.

Billing Frequency

In its submission on the Board’s Policy Review of Electricity and Natural Gas Distributors’ Residential Customer Billing Practices and Performance, Oakville Hydro identified a number of barriers in moving to monthly billing, including:

- Internal resource requirements
- Cost containment
- Transitioning water and wastewater services to monthly billing

The Board’s decision to extend the timeline for the transition to monthly billing to December 31, 2016 will assist Oakville Hydro in meeting the requirement to provide monthly billing to all residential and small business customers within the required timeframe. Oakville Hydro will continue to promote electronic billing as a means of cost containment however, it expects that the costs associated with the implementation of monthly billing will outweigh the benefits.

Estimated Bills / Billing Accuracy

On August 8, 2014, the Board held a webinar on the Development and Implementation of the Scorecard Billing Accuracy Measure for Electricity Distributors. In the webinar the Board clarified that an estimated bill is defined when start or end index values are not based on actual meter reads. A bill that uses an estimated start or end index read is deemed as an estimated bill. Any estimation that is performed between the start and end index which conforms to the VEE Standard for the Ontario Smart Metering System Issue 4.3, dated January 16, 2013 is not considered to be an estimated bill.

Oakville Hydro suggests that the proposed definition of an accurate bill in paragraph 7.1 of the Distribution System Code be modified to reflect this definition. For example:

“accurate bill” means a bill that contains correct customer information, correct start and end meter readings, and correct rates that result in an accurately calculated bill.

Respectfully submitted,

Original Signed by

Mary Caputi
Director, Regulatory Affairs
Telephone: 905-825-6373
Email: mcaputi@oakvillehydro.com