



## *Cornerstone Hydro Electric Concepts Association Inc.*

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August 19, 2016

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, Ontario M4P 1E4

**Re: Notice of Proposal to Amend the Distribution System Code regarding  
Customer Complaints – Board File No. EB-2016-0179**

Dear Ms. Walli:

CHEC is an association of fifteen (15) local distribution companies (LDC's) that have been working collaboratively since 2000. The comments over the following pages express the views of the CHEC members.

Pursuant to the OEB's letter dated July 22, 2016, this letter constitutes Cornerstone Hydro Electric Concepts Association's (CHEC) comments with respect to the Board's invitation to comment on the "Proposed Amendments to the Distribution System Code for Customer Complaints".

CHEC's comments on the proposed amendments are as follows:

**Section 10.2 (OEB Contact Information)** – CHEC Members take customer complaints seriously and considers the resolution of customer complaints to be a key component to the provision of excellent customer service. An adequately resolved customer complaint that is within the control of the utility provides a positive experience for both the utility and the customer. As such, utilities should be given the opportunity to resolve a complaint before providing OEB contact information. Providing OEB contact information upfront circumvents the normal complaint resolution process and makes it look like the utility is attempting to deflect, rather than address the issue. OEB contact information should only be provided if requested by the customer, if the complaint cannot be resolved, or at the end of the complaint resolution process.

In addition to the above, it is recommended that protocol dictate that if a customer contacts the OEB with a complaint prior to contacting the utility, that the OEB direct the customer back to the utility for an initial response. This aids towards strengthening the customer/utility relationship by allowing the utility the opportunity to resolve the issue first.

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**Section 10.3/10.4 (Direct E-Mail/Phone/Address)** – Instead of direct contact information it would be better to permit generic contact information for the purposes of customer complaints. In this sense, customer complaints become a shared responsibility within the utility ensuring any complaint received is addressed promptly should a primary contact be absent or away from the office.

**Section 10.6 (Complaint Response Time)** – While utilities always make their best effort to respond as quickly as possible to the OEB, the 2-day timeframe specified in Section 10.6 (a) is very tight. Required information may not always be readily available due to resource constraints within a utility. CHEC would suggest that 4 to 5 business would be more appropriate for Section 10.6 (a) type complaints.

In addition to the above, the term “any other matter” is at the discretion of OEB staff and is open for interpretation. The OEB either needs to define the term “any other matter” or institute an appeal process for instances where the OEB and the utility do not agree as to what constitutes “any other matter”.

**Section 10.8 (Additional Information Response Time)** – For the same reasons as outlined in 10.6 above, CHEC would suggest that 4 to 5 business days would be a more appropriate timeframe for submitting additional information beyond what is specified in section 10.7.

In addition to the above and similar to Section 10.6 above, the response time for additional information is dependent on what OEB staff considers to be “reasonable”, which may not be appropriate in all cases. The OEB either needs to define the term “reasonable” or institute an appeal process for instances where the OEB and the utility do not agree as to what is “reasonable”.

**Section 10.10/10.11 (Extensions)** – Similar to Section 10.6/10.8 above, and for the same reasons as previously noted, the timeframe to request an extension of 1-day prior to the expiry of the applicable deadline is very tight. CHEC would suggest a timeframe of 2 to 3 days would be more appropriate.

In addition to the above and also similar to Section 10.6/10.8 above, the time for extensions is left to the discretion of the OEB, which may not be appropriate in all cases. The OEB either needs to define plausible extension times for various situations or institute an appeal process where there is a disagreement between the OEB and the utility regarding extension times.

Please note: A single appeal process could be instituted to address each of sections 10.6, 10.8, 10.10, and 10.11 noted above.

**Other Comments** – Please note the following additional comments:

- Based on the OEB’s Consumer Contact and Complaint Statistics, the number of complaints registered on an annual basis is minimal. Even more so for the

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number of complaints escalated by the OEB. This would suggest that a simpler approach may be more appropriate than codifying the complaint resolution process. For example, perhaps a Customer Complaint Guideline would suffice for formalization of the process.

- There is potential for confusion between what constitutes a customer complaint and what constitutes a customer enquiry. Care will have to be taken to ensure that a change to the customer complaint process does not unintentionally result in an increase or decrease in customer complaints. Analysis of customer complaints should be maintained on an ongoing basis to ensure that there are no adverse effects as a result of formalizing the process.
- In order to complete the complaint resolution process, a section should be added that requires the OEB to provide the utility with any related documentation (e.g.: letters, e-mails, etc.) and the final outcome of the complaint, should a complaint be escalated to the OEB for resolution. In this sense, the utility would then have a full account of the complaint and resolution for future reference.
- In order to ensure fairness, if during the complaint resolution process, new and relevant information (e.g.: a complaint is incorrectly allocated to the wrong distributor, the complaint relates to a retailer and not a distributor, etc.) is disclosed that meaningfully impacts the original complaint, the process should be reset for the purposes of addressing customer complaints.
- The E-Portal currently used for customer complaints is not conducive to the proposed customer complaint process. CHEC suggests that the following technological improvements to the E-Portal would be required to support the proposed complaint process:
  - Once documents are submitted, they disappear from the portal. The portal should keep all documents related to a complaint active, much like the current RESS Portal. This way the document can be reviewed as needed.
  - In addition to the above, an audit trail would help utilities track the status and progress of a customer complaint.
  - Users should have the ability to amend documents after they have been uploaded, until the required timeline for submission has expired.
  - It would be helpful for utilities to receive a confirmation e-mail from the OEB once all documents related to a complaint have been successfully submitted.
  - Utilities should have the ability to print documents in pdf format.
  - Utilities should have the ability to update their contact information online.

We trust these comments and views are beneficial to the Board's initiative. CHEC looks forward to continuing to work with the Board in this matter.

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Yours truly,

*Kenneth B. Robertson*

Kenneth B. Robertson CPA, CGA, MBA  
Finance/Regulatory Analyst  
43 King St. West, Suite 201  
Brockville, ON K6V 3P7  
[krobertson@checenergy.ca](mailto:krobertson@checenergy.ca)  
519-872-1100