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October 5, 2016

VIA RESS, EMAIL and COURIER

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

RE: EB-2015-0268 - NOTICE OF REVISED PROPOSAL TO AMEND A CODE AND TO AMEND A RULE, REVISED PROPOSED AMENDMENTS TO THE ELECTRICITY RETAILER CODE OF CONDUCT, THE CODE OF CONDUCT FOR GAS MARKETERS, THE RETAIL SETTLEMENT CODE AND THE GAS DISTRIBUTION ACCESS RULE

On September 8, 2016 the Ontario Energy Board (the “OEB” or the “Board”) issued a Notice of Revised Proposal to Amend a Code and to Amend a Rule (the “Notice”) with respect to certain revised proposed amendments to the Electricity Retailer Code of Conduct, the Code of Conduct for Gas Marketers, the Retail Settlement Code and the Gas Distribution Access Rule (“GDAR”). These amendments are intended to address certain findings and implement recommendations from the Board’s “Consumers Come First” Report and to implement amendments to the *Energy Consumer Protection Act*.

The following are the written comments of Enbridge Gas Distribution Inc. (“Enbridge”, or the “Company”) in relation to the revised proposed amendments. All of Enbridge’s comments relate to sections B.2 and B.3 of the Notice, which address proposed changes to GDAR.

General Comments

Enbridge acknowledges the Board’s goals in making changes to GDAR that will ensure that consumers receive clear information from their gas distributor about the gas marketer with whom the consumer has contracted. Enbridge’s current business processes can accommodate the intent of most of the changes to GDAR proposed by the Board in its Notice. Enbridge will implement changes to address the remaining items noted in the changes to GDAR. Enbridge’s comments below in relation to sections B.2 and B.3 of the Notice indicate how this will be accomplished.

As noted below, however, Enbridge believes that at least one of the proposed changes to GDAR should be made less prescriptive. Specifically, Enbridge does not believe that it is necessary or beneficial for the Board to prescribe the form of letter to be sent to consumers who have switched to a gas marketer. In the EB-2010-0280 proceeding¹, the Board acknowledged that there is benefit to allowing gas distributors to have flexibility over customer service standards and practices, so long as those practices meet the Board's expectations and are transparent and ultimately enforceable by the Board. In that case, the Board decided not to use a prescriptive approach in GDAR to mandating the specific provisions of gas distributor's customer service rules. Enbridge submits that the same principles apply here, such that it is neither necessary nor appropriate to prescribe the specific form of letters that gas distributors send to low-volume consumers who have switched to a gas retailer. Therefore, Enbridge requests that the changes to 4.3.10 of GDAR be re-drafted to be more permissive, to require gas distributors to send letters/notices to "switching" consumers but to replace the requirement to use a prescribed form of notice with a requirement that the letters/notices sent contain the information set out in the form of letter/notice approved by the Board.

While Enbridge appreciates that the Board wishes to see the new GDAR provisions implemented as soon as possible, the Company notes that the proposed changes require changes to customer information systems that take time to put into place. As explained below, Enbridge may require more time than has been contemplated, and requests that the implementation date for all changes to GDAR (sections 4.3.10 and 6.1.4/6.1.5) be specified as July 1, 2017.

Finally, Enbridge notes that there will be costs associated with the proposed changes to GDAR. To the extent that these costs relate to changes to customer information systems or other systems, then Enbridge plans to record the costs in its Gas Distribution Access Rule Implementation Deferral Account ("GDARIDA") for later disposition. Incremental costs of providing notice to customers who switch to/between gas retailers will be recovered from the pending gas retailer.

B.2 - Revised Proposed Amendments to the RSC and the GDAR Mandating a Written Notice of Switch

In the proposed change to section 4.3.10 of GDAR, the Board has mandated that gas distributors must send a notice/letter to low-volume customers in the event of a switch. The amendment proposes that the notice/letter must be in the form approved by the Board.

Enbridge notes that it currently sends a letter to its Large Volume customers in the event of a switch. In order to minimize customer confusion and maintain consistency, Enbridge is proposing that it utilize a similar letter for low-volume consumers.

¹ EB-2010-0280, Notice of Proposal to Amend a Rule (re. Proposed Customer Service Amendments to GDAR), June 29, 2011, at pp. 6-7.

The Company's proposed form of letter for its low-volume customers is provided in Attachment 1 to these submissions. This preferred letter format incorporates the information suggested in the Board's form of notice/letter proposed in Attachment "D" to the Notice. The format and information contained in Enbridge's proposed new letter is similar to the other 27 letters currently sent by Enbridge as required by GDAR. The Board has not prescribed the specific format and wording of any of those letters, and Enbridge does not believe that is necessary for the new notice/letter to low-volume consumers who switch to/between gas retailers.

Enbridge will not be able to implement this change to its business processes (the sending of this new letter/notice) until July 1, 2017. This is due to a current black out period (until May 2017) on any changes to EnTRAC due to in-flight changes required for both Cap & Trade, and Dawn Transportation Service which limits Enbridge's ability to affect the change.

In terms of the cost of printing and postage in relation to the amendment, Enbridge is proposing that it would collect these costs from the pending retailer in the case of a switch.

B.3 - Revised Proposed Amendments to the RSC and the GDAR to Make Retail Contracts More Visible on the Bill

In the proposed changes to sections 6.1.4 and 6.1.5 of GDAR, the Board has mandated that gas distributors include retailer contact information on the bill for customers who opt to purchase their gas from a retailer.

Enbridge notes that it currently includes wording on the bill which states who is supplying the customer's natural gas, the price, name and contact number for the gas supplier. The attached bill, set out in Attachment 2 to these submissions, provides an example of what Enbridge currently includes on its bill for those customers choosing to procure their natural gas from a retailer.

Enbridge can and will include the additional information required by the changes to sections 6.1.4 and 6.1.5 of GDAR on low-volume consumer bills. Enbridge can and will accommodate the provision of a retailer's website on the bill. Further, while Enbridge can accommodate inclusion of the statement "YOU ARE BUYING YOUR GAS FROM" on the bill, it is not clear that this is necessary. Currently, as seen in the sample bill at Attachment 2, Enbridge already has a line indicating "Natural gas supplied by [retailer]" under the heading "Natural Gas Supply Information". If Enbridge is required to add prescribed wording, this may result in additional cost impacts related to an additional line on the bill and potentially postage and printing, depending on the billing scenario. These costs will be recorded in the GDARIDA for later recovery from customers. A less prescriptive approach which allows the Company to maintain the current bill messaging would avoid the aforementioned cost impacts.

The current P2P Schemas within the EBT Standards only allow for a retailer name and phone number to be provided to Enbridge. To accommodate this change, the EBT P2P Schemas relating to price points will have to be changed. This change can be accommodated by Enbridge by changing only EnTRAC, however, retailers will have to manually update each price point that is active with the required Bill Presentment Retailer Website information. This would also apply to each new price point created.

Enbridge will undertake discussions with the GDAR working group to discuss the changes to the bill and the information required from retailers. The GDAR working group will need to recommend if market testing is required for these amendments as the P2P Schemas have not been modified since GDAR was implemented in July 2007. At this time, Enbridge believes that the necessary changes can be implemented for the July 1, 2017 implementation date stated in the Board's notice. In the event that Enbridge and the GDAR working group determine that more time is required for implementation, Enbridge will inform the Board of a proposed later date.

Please contact the undersigned if you have any questions.

Yours truly,

(Original Signed)

Joel Denomy
Manager, Regulatory Applications

Attach.



Enbridge Gas Distribution
500 Consumers Road
North York, Ontario M2J 1P8
Canada

«DATE»

«customer»
«street», «unit»
«City»
«PostalCode»

Dear «CUSTOMER»:

Re: Account Number: «ACCOUNTNUMBER»

As your natural gas distributor, Enbridge Gas Distribution is committed to keeping you informed about changes to your account.

Enbridge received a request from «PENDING VENDOR - MSA LEGAL NAME» that you have selected them as your new natural gas supplier effective «ENROL EFFECTIVE DATE».

As per the Ontario Energy Board Gas Distribution Access Rule, you may proceed with one of the following options:

- A) Take no action, which will allow the transition to proceed as scheduled
- B) Contact «PENDING VENDOR - MSA LEGAL NAME» to discuss «PENDING VENDOR - MSA LEGAL NAME» sending a request to Enbridge to cancel the above request. Note: «PENDING VENDOR - MSA LEGAL NAME» would need to contact Enbridge prior to «CONTEST PERIOD END DATE» to terminate the above request.
- C) Contact Enbridge prior to «CONTEST PERIOD END DATE» to cancel the above request after you have explored your contractual obligations with «PENDING VENDOR - MSA LEGAL NAME».

You will continue to receive your bill from Enbridge Gas Distribution Inc., using the contracted rate <<PPG RATE>> provided by your new natural gas supplier «PENDING VENDOR - MSA LEGAL NAME». Your billing cycle day will remain the same.

If you have any questions about this change to your account, please contact «PENDING VENDOR - MSA LEGAL NAME» at «PENDING VENDOR - BILLPRESENTMENTPHONENUMBER».

For general questions about natural gas contracts, you can visit the Ontario Energy Board's website www.ontarioenergyboard.ca or contact the OEB's Consumer Relations Centre at consumerrelations@ontarioenergyboard.ca or 1-877-632-2727 (toll free). The Ontario Energy Board is the independent government agency that oversees Ontario's electricity and natural gas sectors.

For more information about Enbridge Gas Distribution, please visit www.enbridgegas.com

Sincerely,

Customer Service

Enbridge Gas Distribution Customer Service
1-877-362-7434



Charges For Natural Gas

Jul 23, 2016 - Aug 23, 2016

Customer Charge	\$20.00
Delivery to You	5.63
Site Restoration Clearance	0.60 ^{CR}
Cost Adjustment	0.13
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Direct Energy	
Transportation to Enbridge	
49 m ³ @ 7.098¢/m ³	3.48
Gas Supply Charge	
49 m ³ @ 23.9¢/m ³	11.71

Charges for Natural Gas	\$40.35 ^{+HST}
HST (Registration 105205140 RT0001)	5.24

Total Charges for Natural Gas **\$45.59**



For questions about your gas commodity contract, call Direct Energy @ 800-348-2999.



Meter Reading Information

Meter Number	1512059
Actual Reading	Aug 23,16 90721
Previous Reading	Jul 23,16 90672
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Gas used this period (m³)	49
PEF Value	0.99040
Adjusted m ³	49

Your bill is based on either actual metered consumption or estimated consumption.

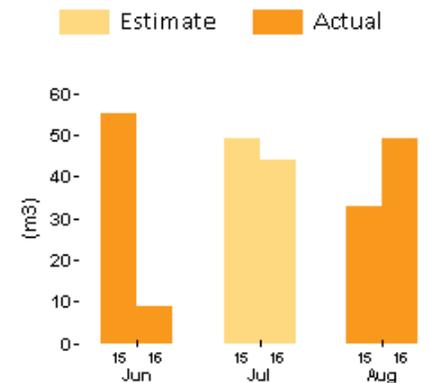


Natural Gas Supply Information

Natural gas supplied by Direct Energy	
Your gas supply rate	23.9¢/m ³



Comparing Your Gas Consumption



2015 (Jan 2015 - Aug 2015):2328m³
2016 (Jan 2016 - Aug 2016):2014m³