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By E-Mail Only

May 25, 2017

To: All Licensed Unit Sub-Meter Providers

**Re: Review of Customer Service Rules
OEB File No.: EB-2017-0183
Survey of Practices & Invitation to Provide Input**

On May 16, 2017, the Ontario Energy Board (OEB) announced that it will review the customer service rules (CSR) for electricity distributors, rate-regulated natural gas distributors and unit sub-meter providers. As part of this review, the OEB is conducting a survey of unit sub-meter providers' practices to collect information on a number of important questions relating to the application of the current CSR.

The survey is a key element of the OEB's research into how the CSR have been operationalized by unit sub-meter providers and the types of issues that may have arisen. The following is the link to the survey: <https://www.surveymonkey.com/r/OEB-CSR-USMP>. You are required to complete the survey on or before **June 15, 2017**, along with providing all supporting information and relevant documents.

In addition, the OEB wishes to provide you with an opportunity to share your experience with the CSR and whether they are meeting the expectations of your customers, as well as your ideas for improvements. We have provided some suggestions for areas you may wish to cover in your comments at Attachment 1. However, we welcome comments on all aspects of the CSR. Your written comments will assist OEB staff in furthering its work on the CSR review including developing options and recommendations. You may wish to comment individually, as groups and/or through associations. Comments should be forwarded by e-mail to CSR@oeb.ca no later than **June 22, 2017**.

If you have any questions regarding this initiative, please contact Gona Jaff, Project Advisor at 416-440-7613 or CSR@oeb.ca.

Yours truly,

Original Signed by

Brian Hewson
Vice President, Consumer Protection & Industry Performance

Attachment 1

Letter to All Licensed Unit Sub-Meter Providers Review of Customer Service OEB File No.: EB-2017-0183

SUGGESTED AREAS FOR COMMENTS

The following are some suggested areas for comments. As indicated, we are looking for information in terms of the expectations your customers are looking for in regards to the CSR and any operational impacts related to the implementation and possible changes in the rules. Please feel free to provide comments and/or recommendations in relation to areas that are not covered by the questions and statements below.

BILLING AND PAYMENTS

1. In terms of billing and payment options, have your customers shown an interest in greater options and choice such as (a) being provided with a choice of two bill payment due dates within a month; (b) being provided with the option of electronic (paperless) billing; (c) accepting other forms of payment such as credit cards?
2. How would providing residential customers with a choice of two or more bill payment due dates within a month affect the unit sub-meter provider's systems and operations?
3. What are the operational implications of accepting credit card payments for the unit sub-meter providers?
4. Does the length of allowed payment period following the issuance of an invoice (current period is 16 days) affect the unit sub-meter provider's operations?

ALLOCATION OF PAYMENTS

5. Are there any reasons for partial payments to be allocated in accordance with customer requests instead of the current requirement that partial payment must first go to electricity charges?
6. What would be the implications for unit sub-meter provider systems and operations of allocating partial payments in accordance with customer requests?

EQUAL MONTHLY PAYMENT AND EQUAL BILLING PLANS

7. What are the implications of offering equal billing/equal monthly payment option to:
 - a. All residential customers
 - b. All general service <50kW customers

DISCONNECTIONS FOR NON-PAYMENT

8. Should the notice period be longer than 10 calendar days before disconnecting a residential or general service <50kW customer for non-payment reasons?
9. Whether and if so, to what extent and under what circumstances residential and general service <50kW customers be protected from disconnection for non-payment during winter months?
10. Whether and if so, to what extent and under what circumstances charges relating to non-payment of accounts (e.g. collection, disconnection, load control devices) should be waived for customers who are unable to pay their bills and facing disconnections?

ARREARS PAYMENT AGREEMENTS (APA)

11. What improvements can be made to the APA terms set out in the Unit Sub-Metering Code such as required down payment, length of repayment period, inclusion/exclusion of late payment charges, number of defaults allowed before cancelling the APA, etc.?
12. Whether and if so, under what terms APAs should be offered to general service <50kW customers unable to pay their bills?

SECURITY DEPOSITS

13. What changes, if any, do you recommend in relation to the security deposit rules for
 - a. Residential customers
 - b. General service <50kW customers

ADDITIONAL COMMENTS

14. Are there any other comments and/or recommendations for consideration? If yes, please provide them under the heading "Additional Comments".