

BY RESS FILING & COURIER

26 June 2017

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

Dear Ms. Walli:

RE: EB-2015-0268 – Notice of Revised Proposal to Amend a Code and to Amend a Rule (September 8th 2016)

Pursuant to the Ontario Energy Board's ("OEB") Notice of Amendment to a Code and of Amendment to a Rule dated December 1, 2016, Kitchener is formally seeking an exemption to the July 1, 2017 implementation deadline of item #2 – *"Revised Proposed Amendments to the GDAR (Gas Distribution Access Rule) Mandating a Written Notice of Switch"* and item #3 – *"Revised Proposed Amendments to the GDAR to Make Retail Contracts More Visible on the Bill"*.

In previous comments to the OEB, Kitchener has indicated that these changes would require significant reprogramming of its newly implemented billing system. Kitchener advised the OEB of a change in its billing system scheduled for January 4, 2016. This change did not occur until April 4, 2016. From this time to the end of March 2017, a corporate-wide blackout period remained in effect for changes to the system.

Kitchener met with its IT support group to review the requirements and provide a timeline of when changes could be implemented. It was determined that Kitchener will be compliant to accept service transaction requests (STRs) via a revised electronic data interchange (EDI) schema by July 1, 2017 but will be unable to comply with the request for changes to the content of the "notice of switch" letter and additional information on the bill. In order to provide for system stability, resource availability, configuration and testing, Kitchener is seeking a 1 year extension to July 1, 2018. This would be in line with OEB's determination of a 6-12 month implementation timeline.

Kitchener currently provides a notice of switch to customers within 5 business days with language similar to that prescribed by the OEB. Kitchener also indicates on the commodity line of its distributor-consolidated bill the word, 'SUPPLIER:' prior to the name of the vendor. Kitchener confirms that it endorses and will abide by the principles and intent of the Amended GDAR on or by July 1, 2018 and will be compliant to accept STRs via

a revised EDI schema by July 1, 2017 in order to not restrict other participants from complying.

Thank you for your consideration of this request. If there are any questions or concerns, please contact me at your earliest convenience.

Kind Regards.

A handwritten signature in black ink, appearing to read "Danny Persaud". The signature is written in a cursive, flowing style.

Danny Persaud
Manager, Gas Supply Operations & Regulations

Cc: L. Baillargeon