

October 5, 2018



**RE: Report of the Ontario Energy Board
Review of Customer Service Rules for Utilities
OEB File No. EB-2017-0183**

CARMA Billing Services would like to provide comment for your consideration to specific sections of the Customer Service Rules for Utilities Phase One.

Section 5.3.1 Content of Disconnection Notice: We would like to suggest wording within the disconnection notice that addresses actions that can be taken by the Utility should the customer fail to meet their payment arrangements to prevent disconnection. In situations where the customer fails to meet their agreed to arrangements the Utility should have the ability to disconnect without having to reset the notification period. Often payments are recalled or arrangements broken after reconnection has occurred. In these cases the notice period should not apply or be limited to the 48 hour notice.

Section 5.3.2 Disconnection Notice Period and Timing: We feel that extension of time periods to issue notices and to perform disconnections will not impact the number of customers that ultimately end up getting disconnected. In most cases arrangements can be made between the two parties to prevent disconnection. In addition the requirement to have a separate "account overdue notice" will only drive up operational costs. To reduce costs we suggest combining the reminder notice with the disconnection notice. This would reduce the notification costs by almost half which ultimately benefits all customers. There does not appear to be substantial research into the effect of notices in relation to preventing actual disconnection to justify introducing additional costs and extending notice and disconnection periods.

6.4 Disconnection/Reconnection Charge: We suggest changing the name of the charge from "Disconnection/Reconnection" to "Disconnection". The charge should be applied to the disconnection action not the reconnection action. In many cases accounts that are disconnected never get reconnected under the delinquent account name. By putting the charge on the disconnection it allows the utilities to potentially recover the costs to perform the service.

Thank you for the opportunity to respond to the proposed Customer Service Rules for Utilities Phase One.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Elliott", written over a horizontal line.

Paul Elliott
Director Billing Systems and Regulations
CARMA Billing Services Inc.