



October 5, 2018

Attention: Kirsten Walli

Board Secretary

Ontario Energy Board

Filed via RESS

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

Dear Ms. Walli:

Brantford Power Inc. (BPI) has reviewed Covering Letter and Report of the OEB released September 6, 2018 in the above-referenced consultation, and would like to provide some comments specific to its circumstance. Generally, BPI's opinions on the proposals included in the Report of the Board are in line with the comments provided by the Electricity Distributors Association (EDA), which BPI also contributed to.

BPI appreciates the opportunity to comment on this consultation. The approach to Customer Service Rules, especially as they relate to customers in arrears, requires a delicate balance and a considered approach. BPI has been diligent in working with its customers to provide them with options to manage their bill payments, including referrals to LEAP, OESP and other community programs, as well as offering various payment plans and options to customers. BPI has implemented programs aimed at reducing burdens to customers, including eliminating security deposit requirements for its residential customers. Of the OEB's proposed changes, the proposals related to removal of specific service charges are expected to be materially impactful to BPI. BPI therefore supports the EDA's position with respect to lost revenue recovery mechanisms if the changes are implemented as proposed prior to a Distributor's next rebasing.

The OEB's covering letter includes a request that utilities identify any technical limitations that may affect a utility's ability to implement the proposals in the Report. The proposals included in the Report would require changes to BPI's internal practices and procedures, as well as programming changes to the system used to bill customers, its Customer Information System (CIS). BPI is currently in the process of converting its CIS from one service provider to another, with expected conversion occurring in early 2019. The CIS conversion project has been underway for several months in 2018, with significant dedicated resources within the company focused on ensuring a seamless transition for our customers and maintenance of above-standard billing accuracy as the key goals of the project.



Should the OEB approve a particular deadline for the implementation of the customer service rules, BPI requests that the OEB include language permitting utilities to request a deferral of some or all of the changes, with appropriate supporting reasoning. Depending on the timing of the required changes, BPI expects that the implementation deadline may conflict with the implementation timeline of its CIS. Generally, it is considered best practice to avoid any major changes during the CIS conversion period, in order to avoid adding further complexity to the changeover and to minimize the risk of billing errors, as well as to ensure continuity of data. To delay the implementation of the CIS in order to implement the new Customer Service Rules would delay the implementation of the new CIS and require significant additional costs to be incurred.

Sincerely,

Original Signed By

Oana Stefan

Manager of Regulatory Affairs (Interim)

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