



October 5, 2018

BY EMAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, ON
M4P 1E4

Dear Ms. Walli,

RE: Review of Customer Service Rules – Phase 1 (EB-2017-0183)

Whitby Hydro Electric Corporation has reviewed the Report of the Ontario Energy Board – Review of Customer Service Rules for Utilities Phase One and provides the enclosed comments for the OEB's consideration.

Regards,

A handwritten signature in black ink that reads "S Reffle".

Susan Reffle
Vice-President

OEB PROPOSAL	WHITBY HYDRO COMMENTS
Security Deposits	
Security deposit requirements should be waived for new residential customers enrolling in the utility's equal billing and/or pre-authorized payment plan as determined by the utility.	Whitby Hydro agrees that security deposits should be waived for new residential customers who enroll in payment plans that provide sufficient risk mitigation. It is Whitby Hydro's view that only Pre-Authorized Payment (PAP) plans and other payment/billing options that include pre-authorized bank account withdrawal would fall into this category.
Security deposits for small business customers should be returned after three years of good payment history.	Whitby Hydro has no objections to this change.
Minimum Payment	
The minimum payment period before late payment charges can be applied by a utility should be at least 20 calendar days from the date the bill was issued to the customer.	No comment
Equal Billing	
<p>General Comments re: Equal Billing</p> <p>Whitby Hydro requests clarification of the definitions of the various terms being used including: Pre-Authorized Payment Plan (PAP), Equal Payment Plan (EPP), and Equal Billing Plan (EBP). There appears to be variation and confusion in the interpretation of these terms and in some case they are used interchangeably. Whitby Hydro's use and definition of the terms for the purpose of this document are summarized as follows:</p> <p>Pre-Authorized Payment Plan (PAP)</p> <ul style="list-style-type: none"> • The full amount of the bill is automatically removed from the customers bank account on the regular (cycle) due date • The customer's bill amount fluctuates depending on the amount of electricity used in a given period (month) <p>Equal Payment Plan (EPP)</p> <ul style="list-style-type: none"> • The customer chooses their monthly withdrawal date (for Whitby Hydro day 1 – 28 of the month) • Historical billing data (\$) is used to calculate an equalized monthly payment amount • This equalized payment is automatically removed from the customer's account each month on the selected date (as opposed to the default due date). <p>Equal Billing Plan (EBP)</p> <ul style="list-style-type: none"> • Equalized payments are calculated (as above) and the customer agrees to make a payment on a date of their choice each month (for Whitby Hydro day 1 – 28 of the month) • Payments are not automatically withdrawn 	

OEB PROPOSAL	WHITBY HYDRO COMMENTS
Distributors should offer non-seasonal residential customers (except customers enrolled with retailers) an equal billing plan.	Whitby Hydro suggests that the OEB provide additional clarity regarding the definition of an equal billing plan (EBP) as compared to equal payment (EPP). Providing equal payment options is helpful to customers to ensure more stable, predictable monthly cash budgeting. Cost/benefits should be considered prior to introducing any additional requirements to modify the detail information presented on the customer invoice since these would involve a large undertaking of CIS and bill print changes.
Electricity distributors should offer equal billing customers the option of making pre-authorized automatic monthly payments, but automatic payments should not be a pre-condition for enrollment	Whitby Hydro is supportive of this change (assuming the definition of EBP described above).
Equal billing customers choosing the pre-authorized automatic monthly payment option should be provided with a choice of at least two dates within a month for automatic payments to be withdrawn	Whitby Hydro already offers EPP customers the choice of withdrawal dates between the 1 st and 28 th of the month. We have no objections of extending this to EBP customers provided our definition of EBP remains unchanged.
Distributors may adjust the methodology for calculating the customer's average monthly bill to account for known changes and/or to accommodate a customer request	Whitby Hydro is supportive of this change.
Distributors may adjust the equal monthly billing amount at any time to accommodate a customer request or if the difference between the equal monthly billing amount and the actual amount is extraordinary	Whitby Hydro is supportive of this change.
Distributors may cancel the customer's equal billing plan after two missed payments under the plan within an equal billing year	Whitby Hydro is supportive of this change

OEB PROPOSAL	WHITBY HYDRO COMMENTS
Allocation of Payment	
Utilities should allocate payments between energy and non-energy charges as per the current electricity Rules unless the customer specifically requests otherwise	Whitby Hydro does not have utility specific comments to provide as it does not currently include non-energy charges on its bill.
A utility should explain to a customer requesting a customized allocation method the potential impact on the customer’s electricity service before processing the request	See above.
Arrears Payment Agreements	
Distributors should not charge residential customers additional late payment charges on the amount that is covered by the OEB-prescribed APA	Whitby Hydro notes that late payment charges are considered a revenue offset. As such, LDCs should be provided a mechanism to recover any material impacts associated with these changes in customer service rules.
Utilities should offer reasonable payment arrangements to small business customers unable to pay their bill. In the event a small business customer fails to perform its obligations under a previous payment plan and the utility terminates the plan, the utility may require that the customer wait 12 months after termination before entering into another payment plan	Whitby Hydro advises that this should be made available at the LDC’s discretion based on assessment of payment risk.
Notice of Disconnection Content	
The Rules should expressly state that a disconnection notice issued to a residential customer should include the information prescribed by the Rules, otherwise it is invalid, and any disconnection following such an invalid notice would be unlawful	Whitby Hydro agrees that the disconnection notice issued to a residential customer should contain all the pertinent information and has spent much effort on the content of our disconnection notice. It is our recommendation that LDCs should be allowed the opportunity to submit their disconnection notice for OEB approval. Further, the OEB should consider providing a standard template as a guide for LDCs. Whitby Hydro also suggests that an invalid notice would be more appropriately referred to as being non-compliant.
Implement housekeeping amendments to the Rules to separate the requirements that apply to all utilities from those that may not apply to all utilities	Whitby Hydro encourages housekeeping changes that make the sequence and layout of rules easier to follow, understand and interpret.

OEB PROPOSAL	WHITBY HYDRO COMMENTS
Disconnection Notice Period, Disconnection Window and Timing	
<p>Utilities should provide customers with an “account overdue notice” at least 14 calendar days before the notice of disconnection is issued</p>	<p>Whitby Hydro works extensively with customers to avoid disconnection. While we generally support the extension of the disconnection window from 11 to 14 days to allow for additional time to work with customers, the additional days suggested for the due date as well as the other areas of the collection/disconnection notice process are, when aggregated, excessive and should be reconsidered. In particular, the disconnection process is already a very lengthy process considering the customer arrears is for usage consumed historically. Further, these extended timelines allow a customer who chooses to enroll in APA to pay only a small portion of their arrears/bills (enough just to avoid a default), and easily bridge the gap from one moratorium period to the next.</p> <p>More specifically, Whitby Hydro suggests that the number of days between the reminder notice and the issuance of a disconnect notice be reduced to 10 days. As the customer will have previously received a reminder notice, they are already aware that their account is in an arrears position. Similarly, we feel that the previous rules of 10 calendar days notice prior to the start of the disconnection window was reasonable and sufficient. Whitby Hydro has no concerns with the disconnection ban on days where the office is closed to the public or on the day preceding that day.</p> <p>Whitby Hydro also advises that substantial modifications would be required in the CIS in order to continue to leverage existing collection tools/modules in the CIS in order to accommodate the additional time proposed in the collections schedules. Due to the numerous day extensions, in many instances, the customer will be re-billed twice before the collection/disconnection process is completed on the current bill. This means that the collection process will not finish prior to the second billing causing the system to drop the current process and start again with the next bill. CIS modifications will entail building, implementing and testing the new module and sufficient time must be allowed for these activities prior to the proposed</p>

	changes going into effect. Overall impacts (cost/benefits) associated with the aggregate number of days added to the collection/disconnection process need to be appropriately evaluated before finalizing any the customer service rule changes.
Before disconnecting a customer’s service for reasons of non-payment, a utility should provide the customer with 14 calendar days’ notice	Whitby Hydro has concerns that due to the proposed extension of the disconnection period, the next bill will already be issued before the previous bill gets through all of the credit control steps which will cause credit levels to be missed. Significant CIS changes may be required resulting in costs and time constraints.
Where a disconnection notice is sent by mail, the disconnection notice should be deemed to have been received by the customer on the fifth calendar day after the date on which the notice was printed by the utility	Whitby Hydro has no objections to this change.
Utilities should disconnect services within 14 calendar days after the applicable minimum notice period	See concerns raised above regarding impacts of additional days (in aggregate) being incorporated into the collection/disconnection process.
Utilities should not disconnect a customer on a day when the utility is closed to the public to make payment and/or reconnection arrangements or on the day preceding that day	Whitby Hydro has no objections to this change.
Winter Disconnection Policy	
Current electricity distribution licence conditions relating to winter disconnection ban to remain in effect subject to changing the required reconnection date from November 15th to December 1st.	Whitby Hydro is supportive of the change to reconnection date from November 15 th to December 1 st . Whitby Hydro remains concerned that the extended days being proposed in the collection/disconnection process coupled with the current winter disconnection policy results in significant limitations on the ability of LDCs to effectively manage collections for those customers who wish to take full advantage of the process in order to avoid providing payment without risk of disconnection.

OEB PROPOSAL	WHITBY HYDRO COMMENTS
Develop winter disconnection and reconnection rules for the gas distributors based on the current licence conditions in effect for electricity distributors as proposed to be amended.	No comments
Late Payment Charges	
The late payment charge be prescribed as follows: 1.5% per month (effective annual rate 19.56% per annum or 0.04896% compounded daily rate)	Whitby Hydro requests that sufficient time is allowed for any CIS modifications and testing required before moving from one methodology to the other. Whitby Hydro recommends that the wording be changed for clarity. Suggested wording is (effective annual rate 19.56% per annum based on a 0.04896% compounded daily rate)
Distributors should clearly describe in their conditions of service their late payment policy including the time from when late payment charges apply	Whitby Hydro does not have any concerns with this proposal.
Collection of Account Charge	
Remove the Collection of Account charge from electricity distributors' approved Tariff of Rates and Charges	Whitby Hydro does not have any concerns with this proposal. However, Whitby Hydro notes that collection of account charges are considered a revenue offset. As such, LDCs should be provided a mechanism to recover any material impacts associated with these changes in customer service rules prior to re-basing under the new rule.
Install/Remove Load Control Device Charges	
Remove Install/Remove Load Control Device charge from electricity distributors' approved Tariff of Rates and Charges	Whitby Hydro notes that install/remove charges are considered a revenue offset. As such, LDCs should be provided a mechanism to recover any material impacts associated with these changes in customer service rules prior to re-basing under the new rule.
Disconnect/Reconnect Charge	
Change the name of the charge from "Disconnect/Reconnect" to "Reconnection"	Whitby Hydro does not have any concerns with this proposal. However, Whitby Hydro notes that disconnect charges are considered a revenue offset. As such, LDCs should be provided a mechanism to recover any material impacts associated with these changes in customer service rules prior to re-basing under the new rule.

OEB PROPOSAL	WHITBY HYDRO COMMENTS
<p>Distributors should apply the charge to the bill following the reconnection and allow residential customers to pay it in equal installments over a period of three months following the reconnection</p>	<p>While Whitby Hydro does not have any concerns with this proposal, we do want to highlight that allowing customers to pay the reconnection fee over three months will be a manual process. We request that the OEB provides LDCs with time to make the appropriate changes in the CIS.</p>
<p>Distributors should waive the charge for eligible low-income customers</p>	<p>Whitby Hydro does not have any concerns with this proposal.</p>