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Vice President and Chief Regulatory Officer
Regulatory Affairs



BY COURIER

April 12, 2010

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

Dear Ms. Walli:

**EB-2007-0722 – OEB Revised Proposed Code Amendments Regarding Customer Service
– Comments from Hydro One Networks**

In accordance with the Board's Notice of Proposal to Amend Codes issued March 12, 2010, affecting the Distribution System Code, the Retail Settlement Code and the Standard Supply Service Code, below are Hydro One Networks' comments on the Board's revised proposed amendments.

Three paper copies are being provided by courier to the Board and I have attached proof of successful submission of these comments through the Board's Regulatory Electronic Submission System as directed in the Notice.

Comments:

We support the Board's decisions to revise the Vital Services part of disconnection notices and also the format of account-responsibility agreements with landlords and customers.

In accordance with the Board's March 12 Notice, these comments do not address the proposed amendments of October 1, 2009. Nevertheless, Hydro One would like to highlight that increases in the costs of processes, activities and systems which benefit some customers, are paid for by all customers. Such cost increases include the number of customers in arrears management, the size of Accounts Receivables, the size of Bad Debts and write-offs, more and varied processes, staff time and system changes. These additional costs will increase as the audience intended for the many of the Amendments has been expanded to all residential customers, not only those who meet a certain qualification.

The Notice invited comments on the merits of requiring utilities to accept cash payments from residential customers seeking to avoid disconnection when utility field staff attends at their premises. Hydro One would not want to be required to accept cash in those circumstances. Our concerns include security, risk of theft, and the processes, provisions and administration that would be needed for the field crews to have, and handle, cash.

Assessment of required changes to our processes to become compliant is underway. When final amendments are issued, if any issues become apparent, we will advise the Board and seek appropriate exemptions.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank