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October 26, 2010

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge Sreet, 27th Floor
Toronto ON M4P 1E4

Dear Ms. Walli,

Re: OEB Consultation on Energy Issues Relating to Low Income Consumers – Hydro One Brampton’s Comments on September 30, 2010 Proposed Amendments (EB-2008-0150)

Hydro One Brampton Networks Inc. (“Hydro One Brampton”) is pleased to file with the Ontario Energy Board (“the Board”) its Comments on Proposed Low-Income and Other Customer Service Amendments. Hydro One Brampton supports the Low Income Energy Assistance Program and acknowledges that Code amendments are necessary for the program to be implemented.

Hydro One Brampton has reviewed the Board’s proposed service processes for customers who qualify as eligible low-income consumers. The proposed amendments define an “eligible low income customer” as a customer who meets the household income cut-off, as confirmed by a “social service agency or government agency accepted by the Board for this purpose.” In order for Hydro One Brampton to establish its Agency

partner(s), Hydro One Brampton must follow its procurement policy which requires fair and transparent treatment for potential vendors or service providers. It is not possible to conduct the necessary RFP process; select the successful Agency partner(s); and have the required Agency network in place and trained province wide by the proposed date of January 1, 2011. Hydro One Brampton would also like to note that given the final Code amendments are not expected to be issued until mid-November of 2010, it will not be possible to implement the required system changes necessary to support this initiative.

The proposed amendments require extending a bill payment date for low income customers. The bill payment date is linked to a number of subsequent billing functions, such as application of late payment charges, identification of balance forward amounts, and collection actions. The amendments also propose a new Arrears Management program for customers who qualify as low income. This is a complex process, which cannot be established in Hydro One Brampton's billing system by January, 2011.

Given the matters stated above, Hydro One Brampton will not be able to meet the proposed January 1st, 2011 implementation date and proposes an implementation date of late spring 2011. This will allow time to address the complexity of these system changes. This timing also aligns with Hydro One Brampton's timeline to select a lead social agency, determine the appropriate local social agencies, provide training regarding qualifying our "low income customers" as defined in the OEB's description of the Code amendments as well as providing time to train staff, and establish what will become important interaction processes between Hydro One Brampton and social service or government agencies. Should the January 1, 2011 target remain unchanged, Hydro One Brampton will seek an exemption for the reasons outlined above.

Hydro One Brampton provides the following specific comments related to the proposed Code amendments:

DSC Section 2.4.12A and RSC Section 7.7.4.1

These amendments mandate a bill insert to notify customers of options related to security deposits and billing errors, should they qualify as a low income customer. Hydro One Brampton requests other communications options be allowed, including bill messages, letters, or outbound recorded messages as these are currently the practices of Hydro One Brampton to communicate a large volume of messages and programs to customers.

DSC Section 2.6.3.1A

This proposed amendment allows a delay in the bill payment date to the 5th business day of the following month. Based on experience with customers, not all of them want to pay at the end of the month. Hydro One Brampton recommends the Board allow the LDC to offer a flex date to the customer, rather than mandating 5th business day of the month. Many accounts are currently paid on the 15th, 20th, or at the end of the month. Extending this to a specific day we believe will only cause additional concerns for customers.

Hydro One Brampton seeks clarification on the following: Will those customers (who have deferred their bill payment date once) continue to have it deferred the following month as their regular payment date? When would those customers revert back the regular programs available for all residential customers?

This change to CIS is significant and costly for many LDCs and not achievable without significant time. For LDCs with large numbers of low income customers, there will be significant cash flow impacts (ie: late payments without late payment charges)

DSC Section 2.7.6A:

This section lists the charges that will be waived should an eligible low-income customer enter into an arrears payment agreement. Hydro One Brampton requests confirmation that “load control” is referring to a load limiter and/or timers.

SSSC Section 2.6.2

This section describes an equalized billing plan. Section 2.6.2B says the plan must be available to an eligible low-income customer receiving standard supply service. Please confirm this is intended to exclude customers who are retailer-enrolled.

DSC Section 2.7.4.4:

This section states that a default of payment agreement must occur over at least two different billing periods. Typically a billing period is considered a monthly bill. Please clarify whether the intent is to track any default over a monthly “period of time” Or if this section has been included to clarify that the “default on more than one occasions” does not have to be two consecutive arrears agreement payments. In some cases, customers may agree to make more than one payment in a monthly billing period.

Hydro One Brampton urges that some down payment should be required as a commitment to enter into the program.

Hydro One Brampton would like to clarify if they are required to send a letter to customers who do not keep up with their monthly AMP payments. Customers are allowed a minimum of 2 defaults and as such Hydro One Brampton believes there is no need to permit one additional default for low-income customers as it would unnecessarily increase the motivation for those customers to default in their payments. Sending an extra letter will cause additional costs for printing, postage and staff to monitor this process.

Hydro One Brampton believes the period of Arrears agreement should remain at 5 and 10 months. If this period is extended to 10 and 20 months and beyond, the probability of a customer not completing the arrears payment arrangement increases. The 5/10 month periods are adequate for low income customers. Hydro One Brampton believes that the agreement should run for all the residential customers including low-income customers in the same manner.

Hydro One Brampton notes that low-income electricity customers will still have options to help them address their bills over the upcoming winter, given that the Code changes announced last July are underway for January implementation. These changes include a

new payment arrears program, the refunding of security deposits before an arrears program or before disconnect notice, as well as a restriction on the use of timers.

Hydro One Brampton would be pleased to provide any additional information that the Board requires in the processing of these comments. If additional information is required, please contact the undersigned.

Sincerely,

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