



500 Consumers Road
North York, Ontario
M2J 1P8
PO Box 650
Scarborough ON M1K 5E3

Shari Lynn Spratt
Supervisor Regulatory Proceedings
Telephone: (416) 495-5499
Fax: (416) 495-6072
Email: EGDRRegulatoryProceedings@enbridge.com

February 17, 2011

VIA RESS, E-MAIL & COURIER

Ms. Kristen Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

Re: Ontario Energy Board File No. EB-2010-0280
Customer Service Amendments to the Gas Distribution Access Rule
Submission of Enbridge Gas Distribution Inc. ("Enbridge")

On January 20, 2011 the Ontario Energy Board ("Board") issued a letter seeking input in assessing the need for developing customer service standards for natural gas distributors.

As per the Board's instructions attached please find Enbridge's submission. This submission is being filed through the Board's Regulatory Electronic Submission System.

Please contact the undersigned if you have any questions.

Yours truly,

A handwritten signature in blue ink, appearing to read 'LSpratt'.

Shari Lynn Spratt
Supervisor Regulatory Proceedings

Attachment

cc: Mr. David Stevens, Aird & Berlis (via email)
All EB-2010-0280 Interested parties (via email)

EB-2010-0280
Consultation on Customer Service Standards for
Natural Gas Distributors

SUBMISSIONS OF
ENBRIDGE GAS DISTRIBUTION INC.

February 17, 2011

**SUBMISSIONS OF ENBRIDGE GAS DISTRIBUTION INC.
IN RESPONSE TO THE FIRST PHASE OF THE CONSULTATION ON CUSTOMER
SERVICE STANDARDS FOR NATURAL GAS DISTRIBUTORS**

1. Enbridge Gas Distribution Inc. (“Enbridge”, or the “Company”) is Ontario’s largest gas distributor, serving over 1.9 million customers in Ontario. Enbridge has a very long history (over 150 years) serving customers in its franchise areas. Over the years, Enbridge has developed responsive, efficient and effective customer service policies and practices. Enbridge’s current customer service policies function effectively and fairly, to the benefit of the Company, its customers and its ratepayers. Among other things, these practices ensure that Enbridge’s customers have the benefit of reliable gas distribution services, and ensure that customers are not unduly burdened by costs caused by the small proportion of customers who fail to pay their bills on time or at all.

A. Overview

2. In its January 20, 2011 letter, the Ontario Energy Board (the “OEB” or the “Board”) set out a consultation process that it intends to conduct prior to proposing any amendments to the Gas Distribution Access Rule (“GDAR”) in respect of customer service rules. As the first step in this process, the Board has invited gas utilities to provide information about their current customer service practices and policies, and about how they compare with the final customer service rules for electricity distributors issued on July 2, 2010 in the EB-2007-0722 proceeding (the “Electricity Customer Service Rules”). The Board has also asked gas distributors to suggest any new or modified policies that are appropriate. Finally, the Board asked two specific questions about whether it is appropriate to issue prescriptive customer service rules that would apply to all gas distributors.
3. Enbridge understands the focus of the Board’s attention in this matter to be on residential customers (Rate 1 for Enbridge). Accordingly, Enbridge’s submissions are confined to customer service policies in place for that class of customers, and do not address customer service policies for larger volume and commercial customers. Enbridge further understands that the Board may pursue a related initiative to consider customer service policy issues specifically related to low-income consumers. Enbridge will participate in any such process when it happens and is open to considering whether

different customer service policies are appropriate for low-income customers. For the purposes of these submissions, Enbridge is not separately addressing any particular issues related to low-income customers.

4. Enbridge's submissions in response to the Board's January 20, 2011 letter are highlighted below and explained in more detail in the sections that follow.
5. In response to the Board's first question, Enbridge submits that there is no need or benefit to adopting a prescriptive approach which would impose a requirement for gas distributors to create customer service policies that align with the Electricity Customer Service Rules. Enbridge states this in light of the lack of complaints received about the Company's current customer service policies and practices and in recognition of the disparity between the costs and the anticipated benefits of a prescriptive approach that would apply the Electricity Customer Service Rules to gas distributors.
6. Instead, as contemplated in the Board's second question, Enbridge urges the Board to adopt a distributor-specific approach that will allow Enbridge to manage its own customer service policies. Such an approach will allow Enbridge to continue to tailor its customer service approaches to the circumstances of its own customers. It will also allow for the costs of moving to new customer service rules to be minimized.
7. In the event that the Board wishes to formally ensure the development and publication of gas distributors' customer service policies, Enbridge submits that any changes to be made to GDAR can be simple and broad. As contemplated in the second question in the Board's letter, such changes can simply require each rate regulated gas distributor to maintain, publish and adhere to customer service standards in certain areas (presumably the same areas included in the chart attached to the Board's letter).
8. Overall, Enbridge believes that its current customer service policies function effectively in the interest of customers and the Company. As set out in detail in these submissions, Enbridge's current customer service policies are already consistent with the spirit and intent of the Board's Electricity Customer Service Rules, providing protection and certainty for customers while allowing Enbridge to maintain appropriate flexibility to account for operational and financial considerations.

9. Nonetheless, the Board's process in this consultation is a good prompt that ongoing consideration and evaluation of customer service policies and approaches is important. Through this process, Enbridge has carefully considered its current customer service policies in light of the Board's policy objectives that underlie the Electricity Customer Service Rules. As a result, Enbridge has determined that it could make certain refinements to some of its policies. The chart attached as Appendix A to these submissions sets out Enbridge's current customer service policies, and notes the areas in which Enbridge can make some changes in order to address certain of the policies that underlie the Electricity Customer Service Rules.
10. Enbridge believes that many of the Electricity Customer Service rules are unnecessary for Enbridge as it already has in place its own customer service policies that meet the intent of the vast majority of the Electricity Customer Service Rules. Moreover, Enbridge questions whether some of the Electricity Customer Service Rules are too limiting, as compared to Enbridge's current approach. For example, the Electricity Customer Service Rules related to arrears management are overly prescriptive, and risk greatly increasing Enbridge's bad debt exposure. Enbridge's current approach, which invites any customer to discuss and establish an appropriate payment arrangement for arrears, is currently functioning well with at least 150,000 such arrangements established in 2010. As another example, the Electricity Customer Service Rules related to security deposits are too restrictive, and take away the protection that ought to be provided by a security deposit. Again, this risks increasing bad debt exposure, which will be expensive for all ratepayers.
11. On a go-forward basis, Enbridge is prepared to publish its customer service policies on its website, and provide a copy of the policies to all new customers. This will promote transparency and certainty for Enbridge's customers.
12. Enbridge's complaint process already refers customers to the Board where the Company is not able to resolve customer service complaints to the customer's satisfaction. Enbridge plans to continue that approach.
13. Enbridge's intended approach, which will maintain and publish its current customer service policies, with several possible refinements, and which will maintain the Board's

role as the ultimate recipient of any customer complaints, meets the Board's objectives set out in the January 20, 2011 letter. This approach provides for customer service standards that are fair, transparent and consistent.

14. Finally, given that there will be significant costs associated with the amendment of current customer service policies (which costs will be quite substantial if the Electricity Customer Service Rules are mandated), a mechanism must be established to allow for such costs to be recovered from ratepayers. Enbridge proposes that, at least until the time of its next cost of service rate proceeding, it be authorized to create a deferral account to track and collect such costs for later disposition.

B. OEB-regulated new customer service rules are not required

15. The Board's January 20, 2011 letter asks Enbridge to answer two questions:
 - (a) Should the Board develop rules which prescribe specific customer service standards to be applied to all rate-regulated gas distributors? If so, should these standards be analogous to the electricity code provisions for customer service standards? What are the potential advantages and disadvantages of this prescriptive approach?
 - (b) Should the Board develop rules which require each rate regulated gas distributor to develop, publish, and adhere to customer service standards for certain prescribed areas of customer service? If so, should the rules include the requirement that gas distributors develop complaint processes which include recourse to the Board in the event disputes are not resolved to the satisfaction of the parties? What are the potential advantages and disadvantages of this less prescriptive approach?
16. Enbridge's overall response is that there is no current need for a suite of new prescriptive rules governing how a distribution utility is to deal with its customers. Ontario's gas distribution utilities have lengthy experience and expertise in serving their customers, generally without complaint or issue. Through their close relationships with their own customers, gas distributors are able to identify repeating and new issues, and

use that information to shape, in a very responsive manner, the way that they work with their customers.

17. An example of Enbridge's responsive practices relates to its winter disconnection policies. It is Enbridge's practice not to initiate disconnections during the winter heating season (after the end of November until March). Beyond this, though, before the start of the heating season, Enbridge visits each customer who is then disconnected, to educate customers about payment options available, including the Winter Warmth Fund. This visit is followed up with a letter and two phone calls, urging the customer to investigate payment options to allow reconnection to proceed.
18. Ordinarily, one would expect that prescriptive new customer service rules for gas distributors would only be necessary as a response to widespread customer complaints or market issues. The fact is, though, that there have not been a significant number of complaints or issues raised by Enbridge's customers (or, as far as Enbridge is aware, by customers of Union Gas). This can be seen in several ways.
19. Enbridge's own experience and records do not indicate any such concerns being raised by customers with any increasing, or concerning, frequency. Over the past three years, there has been an average of less than 50 customer service complaints per year to the OEB from Enbridge customers.¹ That is an extremely low number when considered in the context of Enbridge providing service and monthly accounts to more than 1.9 million customers (i.e. ~23 million bills per year).
20. Similarly, the Board's public records (as set out in the April to June 2010 Consumer Snapshot²) indicate that less than 20% of the consumer complaints received relate to utility practices, and that many (perhaps most) of those relate to electricity distributors.³ In terms of absolute numbers, the Board's records indicate that it receives less than

¹ Enbridge's records (from its Ombuds Office) track calls from the OEB related to customer complaints - the number of complaints has ranged from 32 to 60 over the past three years.

² http://www.oeb.gov.on.ca/OEB/Documents/For%20Consumers/ConsumerSnapshot_2010_Apr-Jun.pdf; see also the OEB's records from the last several years at: <http://www.oeb.gov.on.ca/OEB/Industry/Media+Room/Publications/Consumer+Reports/Overall+Consumer+Enquiries+and+Issues>

³ As seen by the fact that the "top ten" issues raised in respect of utilities include several electricity-only issues such as smart meters, debt retirement charge and Provincial Benefit.

1,000 customer complaints per year in respect of all utility issues (again, most of these may relate to electricity distributors).

21. Additionally, the Board itself has recognized that, at least in respect of security deposits, there are no substantial customer concerns in respect of Enbridge's current policies. This is seen in EB-2008-0313 proceeding, where the Board decided not to proceed with changes to security deposit rules for gas distributors based, in part, on its determination that "the security deposit policies of the two largest natural gas distributors do not appear to be the subject of widespread concern at this time".⁴
22. To the extent that the proposal to develop and implement new customer service rules for gas distributors that mirror the Electricity Customer Service Rules is influenced by a desire to align the policies of electricity and gas distributors, Enbridge submits that such alignment is unnecessary. Concerns that the Board might have about standardizing the customer service practices of the more than 80 electricity distributors are not applicable in the context of gas distribution, where there are only two significant regulated market participants. To date, the Board has not found it necessary to comprehensively prescribe the customer service policies employed by Ontario's main gas distributors, and there has been no change in circumstances to justify why such a step is needed now.
23. One aspect of the creation and implementation of new customer service rules that must not be overlooked is the associated cost. Assuming that new customer service rules for Enbridge would be substantially similar to the Electricity Customer Service Rules, these costs will arise in three main ways: up-front implementation costs (system and process changes), increased administration and annual operating costs and increased bad debt and working capital costs.
24. Enbridge estimates that in adopting the Electricity Customer Service Rules, the Company would incur up-front implementation costs to address such items as system changes (including testing), updates to training and process documentation and the actual training of staff that would be administering these new rules. Enbridge estimates these costs (which would be one-time costs) would be in the range of \$2.5 to \$5 million.

⁴ http://www.rds.ceb.gov.on.ca/webdrawer/webdrawer.dll/webdrawer/rec/140042/view/Notice_Termination_GDAR_20090717.PDF

25. The costs of additional staff time to administer the various new account management and security deposit processes for all customers would be substantial. The administration costs primarily stem from handle times in the call centre for educating customers on the rules and working through payment arrangements over an extended period of time in addition to responding to customer inquiries around confusion on the practical application of the rules for security deposits. Enbridge estimates that these costs would be in the range of \$2.5 to \$3.5 million per year. In the event that the Board requires that all customers be provided the opportunity to pay their accounts using a credit card (such that the credit card fees had to be absorbed by the Company), then this could add over \$15M in additional annual costs.
26. Beyond the additional operating (system and staffing) costs that would result from new customer service rules in the form of the Electricity Customer Service Rules, it is highly likely that bad debt and working capital costs will increase beyond what is currently approved. Allowing customers more time and greater flexibility in paying outstanding accounts, and denying distributors the ability to meaningfully use security deposits to reduce exposure to bad debt, will increase costs/losses to distributors. Enbridge's preliminary estimate is that implementation of the Electricity Customer Service Rules would increase its bad debt and working capital costs, and reduce late payment penalty revenue, by an amount in the range of \$9.5 to \$14.5 million per year.
27. The additional costs associated with any new customer service rules will ultimately be absorbed by Enbridge's ratepayers. Thus, while the implementation of the Electricity Customer Service Rules could potentially benefit a small subset of customers who could receive more generous payment terms and treatment of overdue accounts and security deposits, that benefit would essentially be funded by other prompt-paying customers (currently over 90% of Enbridge's customers pay their accounts in a timely fashion). As set out above, Enbridge estimates that these costs would be in the range of \$2.5 to \$5 million for one-time costs and \$12 to \$18 million for additional annual costs (not including the over \$15 million in further additional annual costs that will be added if Enbridge is required to provide a no-cost credit card payment option to customers).
28. Another issue to consider is the time required to implement new customer service rules that align with the Electricity Customer Service Rules. Enbridge's preliminary estimate in

this regard is that it would need at least eighteen months lead time to fully implement new customer service rules of that type.

29. In light of the apparent costs associated with the Electricity Customer Service Rules, and in light of the fact that the need for these rules is not easily apparent, Enbridge encourages the Board to refrain from the prescriptive approach contemplated in the first question in the January 20, 2011 letter.
30. To the extent that the Board deems it necessary to develop rules to mandate customer service policies for gas distributors, then Enbridge firmly believes that such rules should be broadly drafted and minimally prescriptive, as contemplated in the second question in the Board's letter. This will allow each gas distributor to develop and maintain its own rules that are responsive to the particular circumstances of its own customers, service area and business.
31. The imposition of prescriptive rules that govern all utilities in these practices takes away or severely limits flexibility that allows utilities to tailor their specific customer requirements and approach to meet the changing circumstances and needs of their customers.
32. This points to a potential concern about the unintended consequences of the approach taken in the Electricity Customer Service Rules, which have the effect of mandating particular customer service rules for every utility to apply to every customer. If gas distribution utilities find that their flexibility to tailor different approaches to customers is taken away or reduced, or if gas distribution utilities find that the new rules are increasing the bad debt costs that must be borne by their ratepayers, then it is possible that some of their current practices that benefit customers may be discontinued.
33. For example, Enbridge currently works with customers to set up suitable payment arrangements based on that customer's needs. In some cases this may mean multiple payment arrangements in a 24 month period. In addition, Enbridge's customers are generally not asking for 5 and 10 month payment arrangements – indeed, in some cases a long payment arrangement term is not to the customer's benefit as it sets an artificial budget and can lead to the customer further over-extending themselves. Enbridge believes that its flexibility to continue a variety of payment arrangement approaches

(which was used in over 150,000 instances over the past year) will be reduced if the Electricity Customer Service Rules are extended to apply to gas distributors.

34. As another example, Enbridge's current policy with respect to new accounts allows Enbridge to initiate new accounts for premises where the previous account-holder moves out, even if the new occupant has not provided a written request for service. This seldom results in any disputes or concerns – where there is an issue, Enbridge addresses it on a case-specific basis. If, however, Enbridge is required to get written confirmation of a new occupant's account request before setting up a new account, then this could add substantial inconvenience and expense. That is because, in the absence of a written request from a new occupant, Enbridge would have to disconnect at the time that the prior occupant terminates. In the context of the more than 200,000 annual moves related to premises served by Enbridge, such a requirement would add significantly to the number of disconnections and reconnections being performed, adding to costs to be borne by customers for little or no benefit.
35. The Board's January 20, 2011 letter indicates that the objective of this consultation is "to ensure appropriate customer service standards that are fair, transparent, and consistent across all gas distributors and are enforceable by the Board".
36. Enbridge submits that its current customer service standards (policies) are fair and appropriate. The relative lack of complaints made by Enbridge's customers demonstrates that its policies are seen to be fair and properly administered. That said, Enbridge has determined that it could make certain refinements to some of its policies. The chart attached as Appendix A to these submissions sets out Enbridge's current customer service policies, and notes the areas in which Enbridge can make some changes in order to address certain of the policies that underlie the Electricity Customer Service Rules.
37. Enbridge has undertaken a preliminary examination of the time and costs associated with implementing these refinements to its customer service policies. The associated one-time costs related to items such as Customer Information System changes and new training are estimated at \$1.5 to \$2.0 million and the ongoing (annual) costs for items such as additional staffing and increased bad debt/working capital costs (and decreased

late payment penalty revenue) are estimated at \$1.0 to \$1.5 million per year. The Company estimates that the lead-time required to implement system changes and training to accommodate these refinements is approximately one year from the time that work starts on this initiative.

38. Enbridge is proceeding on the understanding that it will be able to recover all of these additional costs from ratepayers. For those utilities that are not in cost of service (like Enbridge), there is currently no straightforward means to recover such costs. To facilitate cost recovery, Enbridge proposes that, at least until the time of its next cost of service rate proceeding, it be authorized to create a deferral account to track and collect such costs, for later disposition.
39. Enbridge is prepared to publish its customer service policies (updated as suggested in the chart that follows) on the Company's website, and provide a paper copy to each new customer, as part of the customer welcome packages. This will promote transparency and certainty for Enbridge's customers in respect of its customer service policies and practices.
40. Enbridge intends to maintain its current customer service complaint process, a description of which is available to all customers on its website (a copy of this document is attached at Appendix B).⁵ That process encourages Enbridge's customers to try to resolve complaints with an Enbridge customer service representative, but also contains an escalation process through which unresolved issues are referred first to Enbridge's ombudsperson and then, if no resolution results, to the OEB. In that manner, the Board will be the ultimate recipient of customer service complaints involving Enbridge's customers.
41. In the result, if Enbridge's intended approach is endorsed, then the Board's objective of fair and transparent customer service standards will be achieved. Consistent with the Board's objectives (set out in its January 20, 2011 letter), Enbridge's intended approach will ensure protection and certainty for customers while allowing Enbridge an appropriate measure of flexibility to allow it to account for operational and financial considerations.

⁵ <https://portal-plumprod.cgc.enbridge.com/portal/server.pt?open=512&objID=733&PageID=0&cached=true&mode=2&userID=2>

42. While Enbridge's intended approach would not require the Board to make any amendments to GDAR, the Company recognizes that the Board may wish to add to that Rule. If that is the case, Enbridge submits that any changes to be made to GDAR can be simple and broad. As contemplated in the second question in the Board's January 20, 2011 letter, such changes can simply require each rate regulated gas distributor to maintain, publish and adhere to customer service standards in certain areas (presumably the same areas included in the chart attached to the Board's letter).

C. Enbridge's current customer service policies and practices

43. In its January 20, 2011 letter, the Board invited gas distributors to fill in a chart setting out the gas distributor's current customer service policies and practices in each of the areas that are part of the Electricity Customer Service Rules. Gas distributors were also invited to set out any changes that they would be prepared to make to their current customer service policies and practices to align with the approach set out in the Electricity Customer Service Rules. The chart set out as Appendix A to these submissions contains Enbridge's response.
44. As set out in detail in the chart at Appendix A, Enbridge's current customer service policies generally address and are consistent with the policy considerations that underlie the Electricity Customer Service Rules. Where Enbridge's customer service policies are different from the Electricity Customer Service Rules, there are good reasons for that difference. In a number of cases, though, as seen in the third column of the chart, Enbridge could make certain refinements to its customer service policies, to further align with the Board's policy objectives that underlie the Electricity Customer Service Rules.
45. While the details of Enbridge's current policies, and potential changes to those policies, are set out in the chart, the following is an overview of how Enbridge's current policies are consistent with the spirit and intention of the Electricity Customer Service Rules in each of the nine areas highlighted by the Board.

- (a) *Under the heading “Bill Issuance and Payment”, the Board states that “Mandatory rules for determining when a bill is overdue for payment will benefit customers and distributors alike by providing both clarity and uniformity of practice. Customers should not be exposed to late payment charges or disconnection by reason of delays in the processing of payment.”*

Enbridge’s current policies and practices ensure that customers are treated fairly and are not exposed to penalties because of payment processing delays. Enbridge could make modest changes to its approach, to extend the time before late payment charges apply so that a due date does not take effect on a non-business day and to accommodate additional time for payments by mail.

- (b) *Under the heading “Allocation of Payment between Gas & Non-gas Charges”, the Board states that Customers should not be exposed to late payment charges or disconnection by reason of partial payments being allocated in whole or in part to non-gas charges.*

Enbridge treats all charges on its bills consistently, so that payments are applied first to the oldest non-current charges, and then to current charges. Late payment charges are applied to all overdue amounts. Enbridge sees no reason why a non-gas charge should not attract late payment penalties. Any overdue amounts represent an extension of credit that is unpaid, and it is appropriate to charge penalties to cover carrying costs for this, and to encourage timely payments. As made clear in the Open Bill proceeding, the same bad debt rates apply to third party charges as to utility charges. It should be noted, though, that there is a clear process directing that when a customer disputes any third party charges, then a hold is placed on the account, and the dispute is referred back to the third party for resolution. Finally, disconnection of gas service is always a last resort for Enbridge and the Company is prepared to work with customer to avoid disconnection of service.

- (c) *Under the heading “Correction of Billing Errors”, the Board states that “Customers should not sustain undue impacts through no fault of their own. A distributor should not benefit from billing errors at the expense of the customer. Practice should be consistent, not discretionary.”*

Enbridge’s current policies and practices ensure that customers are not unduly impacted by billing errors. On a go-forward basis, Enbridge could make refinements to its current approach to bring it into greater alignment with the Electricity Customer Service Rules to ensure that over- or under-billing adjustments relate to a two-year period.

- (d) *Under the heading “Equal Payment & Equal Billing Plans”, the Board notes that these tools are “Of benefit to customers (easier to budget) and distributors (customers more likely to pay; consistent cash flow). Customers can co-ordinate due dates with receipt of income. Review and reconciliation procedures protect customers from significant over- or under-billing.”*

Enbridge’s “Budget Billing Plan”, which is available to all gas heating customers, is currently used by approximately 53% of its customers and allows those customers to smooth their monthly payments. Enbridge administers the Budget Billing Plan in a manner that seeks to minimize over and under billing and commits to performing a review at least once per year along with the annual reconciliation. On a go-forward basis, Enbridge could the Budget Billing Plan to customers in arrears who have entered into a payment arrangement. Additionally, Enbridge could conduct a semi-annual review to adjust the monthly payments if consumption or approved changes have materially changed.

- (e) *Under the heading “Disconnection Notices”, the Board notes that “Customers should receive adequate notice of disconnection and the options available to avoid disconnection.”*

Enbridge’s disconnection processes ensure that customers receive proper advance notice. Current practices ensure that disconnection notices are sent to customers in a timely fashion, and a last call is made to a customer 48 hours before disconnection. Going forward, Enbridge could make some changes to its

disconnection notices to more explicitly set out options available to customers to avoid disconnection.

- (f) *Under the heading “Disconnection Procedures”, the Board notes that “Additional notice of disconnection and information on payment options may help customers avoid disconnection”. The Board also has a hearing titled “Suspending disconnection action”, under which it notes that “Customers and distributors can avoid disconnection if payment is imminent.”*

Enbridge’s disconnection processes require that customers be provided with final notice, which includes information about payment options, before disconnection is completed. Where Enbridge receives notice that a customer is arranging for payment from a third party (including social agencies), then disconnection actions are suspended. On a go-forward basis, Enbridge could its policy to stipulate that this suspension of disconnection will be in place for 21 days.

- (g) *Under the heading “Security Deposits”, the Board notes that Security deposits: (i) must be applied to gas charges before a disconnection notice can be issued; (ii) may be paid or repaid in instalments; and (iii) must be waived/refunded with good payment history.*

Enbridge’s security deposit policy is broadly consistent with these requirements, with one exception. Enbridge does not apply the security deposit to gas charges before initiating disconnection actions. On a go-forward basis, Enbridge could make changes to its current policies to ensure that Enbridge will take into account the amount of any security deposit being held before issuing a disconnection notice. In other words, no disconnection notice would be issued if the amount of arrears is less than or equal to the amount of the security deposit.

- (h) *Under the heading “Arrears Management Programs”, the Board notes that “These programs provide terms by which customers and distributors may avoid disconnection and mitigates accumulation of very large arrears.”*

Enbridge offers all customers in arrears the opportunity to discuss and establish a payment arrangement in order to avoid disconnection and clear up arrears.

These payment arrangements are set based on a customer's particular circumstances, and vary from case to case. Enbridge requires and uses a flexible approach to tailor varied solutions that work in different situations. This approach is very effective – Enbridge established over 150,000 payment arrangements with customers in 2010. On a go-forward basis, Enbridge could refine this process to ensure that customers receive 10 days written notice if a payment arrangement is to be cancelled.

- (i) *Under the heading “Management of Customer Accounts” the Board notes that this will “Support constructive third party involvement and protects customers and distributors from fraud and misunderstandings”.*

Enbridge's current account management approach, where accounts are created upon receipt of a request from a customer or its agent, does not appear to cause any issues in terms of “fraud and misunderstandings”. However, in order to enhance clarity of account ownership in landlord/tenant situations, on a go-forward basis Enbridge could create clearer forms of agreement to stipulate that landlords are responsible for accounts in the event that a tenant moves away and no new tenant enrolls with Enbridge.

D. Next Steps

46. The Board's January 20, 2011 letter indicates that once the Board has received the requested information from gas distributors, and responding submissions from other stakeholders, then it will assess the next steps in the development of customer service rules for gas distributors.
47. In the event that the Board determines that it is necessary and appropriate to make amendments to GDAR, or to create other rules in respect of Enbridge's customer service policies, then Enbridge requests that it be provided with a meaningful opportunity to provide submissions about the content of any such proposed rules.
48. Among other things, Enbridge believes that it will be important to provide information about the costs and timing associated with any proposed rules, so that their full impact can be assessed and an implementation timetable and cost recovery approach can be

determined before the rules are finalized. In order to best facilitate a complete exchange of information, it may be appropriate to convene a stakeholder conference with all interested parties, as well as Board members and OEB Staff, so that all perspectives can be presented and exchanged efficiently and transparently.

49. Enbridge would be pleased to answer any questions about these submissions and other matters related to this consultation process.

Attachment A:

Existing and Proposed Customer Service Policies and Practices of Natural Gas Distributors

Completed by:

*Tanya Ferguson
Enbridge Gas Distribution
Customer Care
Manager, Customer Care Operations
(416) 495-5765
Tanya.ferguson@enbridge.com*

Date: February 17, 2011

1. **Bill Issuance and Payment:** Mandatory rules for determining when a bill is overdue for payment will benefit customers and distributors alike by providing both clarity and uniformity of practice. Customers should not be exposed to late payment charges or disconnection by reason of delays in the processing of payment.

Customer Service Rules for Electricity Distributors ¹	Existing policies and practices	Proposed modified policies and practices
The minimum payment period (before a late payment penalty can be applied) will be at least 16 days from the date the bill was issued to the customer. The date on which the bill was issued is determined to be three days after it was printed if sent by mail or on the date on which an email was sent over the internet. A bill payment is deemed to be received from the customer: three days before it is received by the distributor if sent by mail; on the date when the payment is acknowledged by a bank, or when the credit card payment is accepted by the	Enbridge's current policies and practices meet the intent of this rule. Invoices are sent to customers on the same day as they are printed, on the "Invoice Date". The payment period is 20 days from the "Invoice Date". Enbridge has already accommodated the three days for bills sent by mail in the payment period. Paper bills are printed and mailed and ebills are sent and posted to the internet on the same day. With respect to electronic and credit card payments, Enbridge is in compliance. Electronic payments are applied to the account as of the date that the payment is acknowledged by the customer's financial institution. Payments received by credit card	Enbridge is proposing to maintain its current policies and practices but would consider a potential enhancement to them with a system change. This change would allow for 3 additional days before LPP is calculated, however the LPP Effective dates shown on the bill will not change. This will accommodate payments received by mail being deemed 3 days earlier and will ensure that payments received after 5pm will not attract LPP. This will also accommodate due dates that fall on a weekend and allow an additional 3 days before LPP is calculated. Such a change will require updates to the Customer Information System, updates to training and process documentation and will reduce LPP Revenue.

¹ Amendments to the Distribution System Code (DSC), the Retail Settlement Code (RSC) and the Standard Supply Service Code (SSSC) coming into force January 1, 2011.

financial institution.	are applied once the charge has been accepted by the financial institution. Payments received by mail are applied to the account as of the date received. Please see "Proposed modified policies and practices".	
Any payment made after 5:00 p.m. is still effective on the day the payment is made. If a due date is a non-business day, it is extended to the next business day.	Payments received after 5pm are effective the following day. Please see "Proposed modified policies and practices". If a due date is a non-business day, it is not extended to the next business day. Please see "Proposed modified policies and practices".	

2. Allocation of Payment between Gas & Non-gas Charges: Customers should not be exposed to late payment charges or disconnection by reason of partial payments being allocated in whole or in part to non-gas charges.

Customer Service Rules for Electricity Distributors	Existing policies and practices	Proposed modified policies and practices
If a bill includes charges other than electricity charges, any payment must first go directly to the electricity charges and then, if funds are remaining, to the other charges. If payment is sufficient to cover electricity charges, the distributor shall not issue late payment charges, a disconnection notice or disconnect the electricity supply. This applies to joint billing agreements when they are renewed, or after two years, whichever comes sooner.	Enbridge's current policies and practices largely meet the intent of this rule. Disconnection is always a last resort for the Utility. Payments received are allocated to the oldest arrears first, regardless of the type of charge, unless otherwise notified of a dispute by the customer. Enbridge will work with customers if there is a dispute about a charge. If a customer notifies that they are disputing a charge, Enbridge will put a hold on the accounts so that no LPP would be calculated and Enbridge will block that charge from being cleared by any subsequent payments on the account. In the event that the payment is insufficient to cover the current month's charges, the partial payment is first allocated to non-gas charges and then to gas charges. Any overdue balances attract Late Payment Penalties, however, a disconnection notice and disconnection is not triggered unless the gas arrears reach a threshold amount.	Enbridge is proposing to maintain its current policies and practices. The Company does not see any reason why non-gas charges should not attract LPP if there is no dispute outstanding on the charge. That unpaid amount represents an extension of credit to the customer and therefore should attract LPP.

3. **Correction of Billing Errors:** Customers should not sustain undue impacts through no fault of their own. A distributor should not benefit from billing errors at the expense of the customer. Practice should be consistent, not discretionary.

Customer Service Rules for Electricity Distributors	Existing policies and practices	Proposed modified policies and practices
Over or under-billing adjustments are permitted over a period of up to two years for all classes of customers. Note that the Limitations Act, 2002 provides a standard two-year limitation period for all actions in debt (subject to any considerations of discoverability). If a customer has been over-billed by an amount equal to or greater than the customer's average bill, the customer has the option of receiving a cheque or a credit on their next bill. If a customer has been over-billed and the amount is less than the customer's average bill, the customer will receive a credit on their next bill. If the customer has outstanding arrears, the distributor may apply the over-billed amount to the arrears first, and may credit or repay the balance to the customer. If a customer is under-billed and is not responsible for the error, the customer is allowed to pay the under-billed amount in equal installments over the same amount of time as they were under-billed for up to a maximum of two years. (e.g., if a customer has been under-billed for five	Enbridge's current policies and practices largely meet the intent of this rule. Enbridge's current policy is such that over or under-billing adjustments on residential accounts are permitted for up to two years if the error is a result of actions by the Company and up to six years if the error is a result of actions by the customer. Please see "Proposed modified policies and practices". Enbridge's current policies and practices meet the intent of this rule. If a customer has been over-billed by any amount, a credit is applied to the account. If the customer chooses to have the amount refunded, they can call Enbridge's call centre and a refund cheque will be issued to them. Please see "Proposed modified policies and practices". Enbridge's current policies and practices meet the intent of this rule. If a customer is under-billed for any reason, the charge is applied to the account. If the customer chooses to pay the under-billed amount in installments, Enbridge will work with the customer to determine a suitable payment	Enbridge is proposing to maintain its current policies and practices but would consider a potential enhancement to them with a change to its policies for processing over or under-billing adjustments. Billing Adjustments will only be permitted over a period of up to two years for residential customers, except in the case of theft or illegal acts of a customer, in which case Enbridge will bill as far back as the information available will allow. Such a change will require updates to training and process documentation and will have an impact on bad debt. In addition, Enbridge would consider a potential system change to include a bill message on bills issued for accounts that are in a credit balance advising the customer that they may call to receive a refund cheque.

months, they will have five months to pay the under-billed amount). When a customer is responsible for the under-billing error, the distributor may require payment of the full amount on the next bill or on a separate bill. These rules do not apply when a distributor has under-billed or over-billed a customer but issues a corrected bill within 16 days of the date the incorrect bill was issued.	arrangement based on that customer's circumstances. Enbridge will allow for a payment arrangement of up to the amount of time the customer was under-billed. Amendments to the Retail Settlement Code sections 7.7.8 and 7.7.9 refer to the payment of interest on over-billing and billing of interest on situations where Enbridge has under-billed customers. Enbridge currently does not charge interest to customers in these circumstances, nor does it pay interest as a practice. Amendment to the Retail Settlement Code section 7.7.10 refers to requirements to advise customers of meter errors and their rights under the Electricity and Gas Inspection Act (Canada). Enbridge currently only advises the customers of these rights if asked by the customer in dispute of a billing adjustment. Please see "Proposed modified policies and practices".	In addition, Enbridge would consider a potential system change to include correspondence or a bill insert in circumstances where a meter error was detected.
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4. **Equal Payment & Equal Billing Plans:** Of benefit to customers (easier to budget) and distributors (customers more likely to pay; consistent cash flow). Customers can co-ordinate due dates with receipt of income. Review and reconciliation procedures protect customers from significant over- or under-billing.

Customer Service Rules for Electricity Distributors	Existing policies and practices	Proposed modified policies and practices
Distributors are required to offer all residential customers receiving standard supply service the option to join an equal monthly payment plan. Only customers that are in arrears and have not entered into an arrears payment agreement may be refused an equal monthly payment option. Customers can join equal monthly payment plans any time of the year.	Enbridge's current policies and practices meet the intent of this rule. Enbridge offers customers the Budget Billing Plan ("BBP"), which is a program that helps spread annual gas costs evenly throughout the year. This plan is not currently offered to non-heating customers, given that their consumption is relatively flat all year long. Enbridge's current policies and practices meet the intent of this rule. Customers in arrears are not currently eligible to join the Budget Billing Plan. Please see "Proposed modified policies and practices". Enbridge's current policies and practices meet the intent of this rule. Customers can join the BBP anytime of the year up to the end of February. If a customer chooses to join the plan after February, their plan will be deferred until September, the start of the next year's plan. After the month of February, consumption drops significantly and the benefits of joining the BBP at that time also drop significantly. New customers are automatically signed up to the Budget Billing Plan. When a new customer calls into the call centre, they are advised that Enbridge has a Budget Billing plan and asked if they would like to join the plan.	Enbridge is proposing to maintain its current policies and practices but would consider a potential enhancement to them with a change to its policies related to allowing customers in arrears to join the Company's Budget Billing Plan. Enbridge customers who are in arrears and have entered into a payment arrangement will be permitted to join Budget Billing Plan. Such a change will require updates to the Customer Information System and updates to training and process documentation.

Distributors may require customers who join an equal monthly payment plan to also join an automatic payment withdrawal plan if the billing cycle is less frequent than monthly. Residential equal payment customers who participate in automatic payment arrangements must be given a choice of at least two dates within a month for automatic payments to be withdrawn. Distributors may continue to issue bills on a monthly, bi-monthly or quarterly basis. Utilities will review customer's monthly billing plans quarterly or semi-annually and adjust the monthly equalized payment if electricity consumption or approved charges have changed materially. Utilities are required to reconcile all of their equal monthly payment plans once during the calendar year but not on the 12th month anniversary of a customer joining the plan. If a customer is in the first year of a plan, they may be reconciled earlier.	Enbridge's current policies and practices meet the intent of this rule. Enbridge's billing cycles are monthly and customers on BBP are not required to sign up for automatic withdrawal. Customers who are on BBP and have signed up for Pre-authorized payment, are not given a choice of withdrawal dates. Customers are BBP are treated the same as customers not on BBP in this area and payments are withdrawn on the LPP Effective date. Having customers choose between 2 dates would add customer confusion as such a change would result in a customer potentially receiving their next bill before the first bill was due. Enbridge's current policies and practices meet the intent of this rule. A review of customers' billing plans is conducted at least once per year, outside of the annual reconciliation. Enbridge is committing to ensuring that a review is conducted at least once per year. If necessary, BBP installment amounts are adjusted. Throughout the year, as customers monitor their BBP progress, they can request review as well. Installments at the start of the plan year and in the mid year review are based on the forecast of consumption, which is based on the consumption at the premise in the preceding 12 months, adjusted for prices in the current year. Enbridge's current policies and practices meet the intent of this rule. The BBP season at Enbridge is from September to July each year. In July, customers' Budget Billing Plans are reviewed and customers are billed or credited a BBP reconciliation adjustment that represents the difference between the charges for gas actually used from the time	
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If the annual reconciliation shows that the customer is owed an amount equal to or exceeding the customer's average monthly billing, the amount will be credited to the customer's account. The customer will be notified of this credit and will have 10 days to request a refund cheque instead of the credit on their bill. If the annual reconciliation shows that the amount owed to the customer is less than the average billing amount, the amount will be credited to the customer's account. If the annual reconciliation shows that the customer owes an amount equal to or exceeding the customer's average monthly billing, the distributor shall recover the balance over the first 11 months of the following year's equal monthly payment plan. If the annual reconciliation shows that the amount the customer owes is less than the customer's average monthly billing, the distributor may collect the full amount by a charge on the bill in the 12th month of the equal monthly payment plan.	they joined the plan and the monthly BBP installments billed to date. In the month of August, customers on BBP are billed for the gas used in the month. Enbridge's current policies and practices meet the intent of this rule. If the annual reconciliation shows that the customer is owed funds (of any amount), a credit is applied to the account. If the customer chooses to have the amount refunded, they can call Enbridge's call centre and a refund cheque will be issued to them. Please see "Proposed modified policies and practices". Enbridge's current policies and practices meet the intent of this rule. If the annual reconciliation shows that funds are owed by the customer (of any amount), the charge is applied to the account. If the customer chooses to pay the reconciliation amount in installments, Enbridge will work with the customer to determine a suitable payment arrangement based on that customer's circumstances. Enbridge believes that recovering the reconciliation amount in the following year's Budget Billing Plan is not in the best interest of the customer longer term and creates an artificial budget for the customer and promotes potentially overextending themselves even further.	In addition, as stated above, Enbridge would consider a potential system change to include a bill message on bills issued for accounts that are in a credit balance advising the customer that they may call to receive a refund cheque.
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5. **Disconnection Notices:** Customers should receive adequate notice of disconnection and the options available to avoid disconnection.

Customer Service Rules for Electricity Distributors	Existing policies and practices	Proposed modified policies and practices
All customers must receive 10 days notice before being disconnected for non-payment. Residents who have provided documentation from a physician that disconnection will pose a significant health risk, must receive 60 days notice before being disconnected for non-payment. When a disconnection notice is issued in a building with multiple units, and a master meter, a copy of the notice must be posted in a conspicuous place in the building. Disconnection notices sent to residential customers must contain prescribed information, such as the earliest and latest date disconnection may occur, the forms of payment a customer may use, that a Board-prescribed arrears management program is available, and that a disconnection may take place whether or not the customer is home at the time.	Enbridge's current policies and practices meet the intent of this rule. A disconnection notice is issued at least 10 days prior to disconnecting a customer for non-payment. The disconnection notice is effective for 30 days and if the service has not been disconnected, a new disconnection notice is issued. Enbridge's current policies and practices meet the intent of this rule. Enbridge currently has no way to track that a customer has a significant health risk, however, if a customer calls into the call centre and explains their situation, a Field Investigator is sent to the premise to investigate the situation. If there is a significant health risk, disconnection of the premise will be suspended. This rule would be much more significant in electricity supply. Enbridge's current policies and practices meet the intent of this rule. Disconnection notices for multi-unit buildings are posted in a conspicuous place in the building. Enbridge's current policies and practices largely meet the intent of this rule. The disconnection notice includes the date that the notice is issued, the overdue amount to be paid, the forms of payment available at this late stage of collections and the phone number to call to report a payment and avoid disconnection. Please see "Proposed modified policies and practices".	Enbridge is proposing to maintain its current policies and practices but would consider a potential enhancement to them with a system change to the information provided on a disconnection notice. The disconnection notice will be updated to include the earliest and latest date disconnection may occur, that Enbridge will work with the customer to arrange a suitable payment arrangement based on the customer's circumstances (please refer to Enbridge comments under "Arrears Management") and advise the customer that a disconnection may take place at any time whether or not the customer is home at the time. Such a change will require updates to the Customer Information System and updates to training and process documentation.

5a. Disconnection Procedures: Additional notice of disconnection and information on payment options may help customers avoid disconnection.

Customer Service Rules for Electricity Distributors	Existing policies and practices	Proposed modified policies and practices
Distributors must make a reasonable effort to contact the customer one final time, in person or by telephone, prior to disconnecting service at least 48 hours before the scheduled disconnection date. There is certain prescribed information that a distributor must provide, such as advising of the potential availability of an arrears program.	Enbridge's current policies and practices meet the intent of this rule. A "last call before redlock" is performed approximately 48 hours prior to a customer being disconnected for non-payment. The customer is informed that the disconnection has been scheduled, and about payment options available to avoid disconnection, a phone number to report a payment and avoid disconnection and the hours of operation. Please see "Proposed modified policies and practices".	Enbridge is proposing to maintain its current policies and practices but would consider a potential enhancement to them with a system change to the information provided in a "last call before redlock". The last call before redlock will be updated to state that Enbridge will work with the customer to arrange a suitable payment arrangements. Such a change will require updates to the Customer Information System and updates to training and process documentation.
If a distributor has been unable to contact a customer 48 hours before a planned disconnection, they should generally make a reasonable attempt to communicate with the customer at the door (subject to consideration of the safety and security of utility field staff).	Enbridge's current policies and practices are different from this rule. Currently out of the consideration for the safety or field staff, there is no additional attempt to communicate with the customer at the door. Enbridge believes that this poses a significant risk to the safety of its employees and contractors	In addition, Enbridge would consider potential change to its business processes to leave a door hanger or card at the door of the customer advising the customer that they have been disconnected and that they may pay by credit card. Such a change will require updates to training and process documentation.
Distributors must, at a minimum, have the facilities and staff available during regular business hours so residential customers can pay overdue amounts by credit card. When a distributor visits a customer's property to disconnect service, customers must be allowed to pay overdue amounts by credit card (and any other form of payment the distributor wishes to accept). <i>Distributors should reconnect a property</i>	Enbridge's current policies and practices meet the intent of this rule. A credit card payment option is available for customers in arrears and/or avoiding disconnection, for a fee. The fee is charged by and paid to Enbridge's credit card payment processor. Enbridge does not retain any part of this fee. The credit card option is available 24x7 through Enbridge's IVR system and through Enbridge's website. It is important to note that if the credit card payment option was provided to customers as a standard option,	

<i>within two business days of payment in full or entering into an arrears management agreement 85% of the time. (This metric already exists in the GDAR 7.3.7.1)</i>	the cost to the ratepayers would be significant at approximately 2% of the amount of the payments processed, which could be in excess of \$15 million depending on the number of customers that would choose this option. Given the availability of the credit card payment option and the fact that for a customer in arrears and pending disconnection, there are 7 opportunities with Enbridge touch points to arrange a payment, Enbridge believes that offering credit card payments at the door is not necessary.	
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5b. Suspending disconnection action: Customers and distributors can avoid disconnection if payment is imminent.

Customer Service Rules for Electricity Distributors	Existing policies and practices	Proposed modified policies and practices
If, during the disconnection notice period, a registered charity, government agency or social service agency advises a distributor they are assessing whether a residential customer is eligible for bill payment assistance, the distributor must suspend disconnection action for a period of 21 days after receiving notification from the agency. If, during the disconnection notice period, a third party, who had previously been designated by the customer to receive any disconnection notices, advises a distributor they are attempting to arrange assistance to help the customer pay their bill, the distributor must suspend disconnection action for a period of 21 days.	Enbridge's current policies and practices meet the intent of this rule. Disconnection action is suspended if there is notification from a social assistance agency of assessment of a customer's eligibility for payment assistance. Enbridge works with the customer on their individual circumstances; however, there is no set time period for the suspension. Please see "Proposed modified policies and practices". Enbridge's current policies and practices meet the intent of this rule. Third party notification is performed through consent, where the customer calls to allow Enbridge to discuss their account with a third party, due to Privacy Legislation. If there is notification from a third party advising that they are attempting to arrange for assistance for the customer, then Enbridge will work with the customer based on their individual circumstances. Any suspension of disconnection is not for a set time period. Please see "Proposed modified policies and practices".	Enbridge is proposing to maintain its current policies and practices and would consider a potential enhancement to them with a business process change such that when Enbridge is notified by a registered charity, government agency, social service agency or a third party that an assessment or arrangement for payment is in process, disconnection action will be suspended for a period of 21 days. Such a change will require updates to training and process documentation.

A distributor must act on the disconnection notice within 11 days of its issuance or the lifting of a suspension. If disconnection does not occur within 11 days from the date of the notice or the lifting of the suspension, the distributor must issue a new disconnection notice and start the process once again.	practices” . Enbridge’s current policies and practices meet the intent of this rule. If the time period of the suspension elapses and the 48 hour notice is still effective, disconnection will occur immediately, otherwise a new 48 hour notice will be issued.	
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6. **Security Deposits:** Security deposits: (i) must be applied to gas charges before a disconnection notice can be issued; (ii) may be paid or repaid in installments; and (iii) must be waived/refunded with good payment history.

Customer Service Rules for Electricity Distributors	Existing policies and practices	Proposed modified policies and practices
Residential customers can pay a required deposit, an increase in a security deposit or a replacement of a deposit applied against arrears, in equal installments over at least six months.	Enbridge's current policies and practices largely meet the intent of this rule. The purpose of a security deposit is to ensure that monthly bills are paid on time and to cover any outstanding arrears at the time the customer ceases to be a residential gas service customer. Security deposits may be required of new customers or customers who have had their gas service disconnected for non-payment. Security deposits are billed on the first monthly invoice and are due by the Late Payment Effective Date. Enbridge will work with the customer to determine a suitable payment arrangement based on that customer's circumstances. Security deposits may be waived if, (1) the Customer provides a letter of reference; (2) the Customer enrolls in Enbridge's Pre-Authorized payment plan; or (3) the Customer has a previous residential account with good payment history. Please see "Proposed modified policies and practices".	Enbridge is proposing to maintain its current policies and practices and would consider a potential enhancement to them with a business process change to allow for a payment arrangement for the payment of a security deposit over a period of up to six months in the case of a new customer. No change is being proposed for customers that are required to pay a security deposit after having their service disconnected for non-payment. Such a change will require updates to training and process documentation.
There must be a review of the security deposit during the year after the first anniversary of the first installment payment.	Enbridge's current policies and practices largely meet the intent of this rule. After two years with a good payment history, the security deposit on file will be refunded with interest in the form of a credit to their bill after the second anniversary of the security deposit being paid. Please see "Proposed modified policies and practices".	In addition, Enbridge would consider a potential system change to have the CIS review customers' security deposits after 12 months from the month it is fully paid to determine if the deposit should be refunded. Such changes will require updates to the system and updates to training and process documentation.
A residential customer's average monthly consumption over a 12-month,	Enbridge's current policies and practices are different from this rule. Security deposits for	In addition, Enbridge would consider a potential system change to have the CIS calculate the arrears, net of the security deposit and compare that to a threshold amount prior to issuing a disconnection notice or disconnection. Enbridge feels this meets the intent of this rule. For clarity, disconnection notices and disconnections would only be issued if the net amount owing, less the security deposit is over the threshold amount. Such changes will require updates to the system and updates to training and

consecutive period in the last two years, must always be used to calculate the maximum amount a distributor can collect for a security deposit. Security deposits must be applied against any arrears and be insufficient to cover any amounts owing before a disconnection notice can be issued to a residential customer. When a security deposit has been applied against any arrears, the customer may have to repay the security deposit, and be allowed to repay in equal installments over at least six months.	residential customers are administered as a flat rate of \$250, regardless of the historical consumption. In its Legacy CIS system, the Company had always administered a flat rate Security Deposit Policy. When the new CIS was implemented in 2009, a variable Security Deposit was implemented which was calculated based on the customer's average monthly consumption. This change resulted in significant customer complaints and as a result, Enbridge implemented a system change to apply flat rate security deposits again. Based on experience, a variable security deposit approach will not be accepted by Enbridge's customers. Enbridge's current policies and practices are different from this rule. Security deposits are not prepayments for gas charges. Enbridge believes that applying security deposits against amounts owing before a disconnection notices is issued is not to the benefit for the customer. This will create a situation where customers use their security deposit as a prepayment of gas charges and a form of revolving credit, which is not the purpose of the deposit. Operationally, this will also cause customer confusion as the Company submits a subsequent request for a security deposit once it is applied. Customers would in practice receive a bill that had the security deposit credited and then a subsequent request for the same deposit back. Security deposits are only applied to an account in situations where the account is in good standing for a period of 24 months or the account has been disconnected for non-payment. Please see "Proposed modified policies and practices".	process documentation.
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7. Arrears Management Programs: These programs provide terms by which customers and distributors may avoid disconnection and mitigates accumulation of very large arrears.

Customer Service Rules for Electricity Distributors	Existing policies and practices	Proposed modified policies and practices
Utilities must make arrears management programs available to any residential customer unable to pay their electricity charges. In the case of distributors who also collect water, sewer and other charges, these amendments apply only to the electricity charges. Any security deposit must be applied to the amounts owing before entering into an arrears payment agreement.	Enbridge's current policies and practices meet the intent of this rule. Enbridge makes arrears management programs available to customers. Disconnection of gas service is always a last resort for Enbridge. The Company will work with customers to determine a suitable payment arrangement based on the customer's individual circumstances. Payment arrangements are offered to all customers in arrears, depending on payment arrangement history. Enbridge's current policies and practices are different from this rule. As identified above, the purpose of a security deposit is to ensure that monthly bills are paid on time and to cover any outstanding arrears at the time the customer ceases to be a residential gas service customer. Enbridge believes that applying security deposits against amounts owing before a disconnection notices is issued is not to the benefit for the customer. This will create a situation where customers use their security deposit as a prepayment of gas service and a form of revolving credit, which is not the purpose of the deposit. Operationally, this will also cause customer confusion as the Company submits a subsequent request for a security deposit once it is applied. Customers would in practice receive a bill that had the security deposit applied and then a subsequent request for the same deposit back.	Enbridge is proposing to maintain its current policies and practices but would consider a potential enhancement to them with a system change to issue a cancellation notice in writing to customers who miss a payment on a payment arrangement advising them that the cancellation of the payment arrangement will take place 10 days later. Such changes will require updates to the system and updates to training and process documentation.

Customers may be required to make a down payment of up to 15% of the arrears plus any accumulated late payment charges (not including other service charges such as reconnection charges) when entering into an arrears management agreement. If a customer owes less than twice their average monthly bill after applying the security deposit and down payment, the minimum length of time to pay the remaining amount is five months. If a customer owes more than twice their average monthly bill after applying the security deposit and down payment, the minimum length of time to pay the remaining amount is 10 months. Distributors can cancel the agreement if a customer defaults on the arrears payment or current bill payment more than once. Customers must be given 10 days written notice before an agreement can be cancelled, and the agreement must be reinstated if the customer pays in full before the cancellation date.	Enbridge's current policies and practices meet the intent of this rule. Down payment requirements and length of payment arrangements are arranged based on the individual circumstances of each customer. Enbridge's current policies and practices meet the intent of this rule. If a customer is in arrears for any amount, Enbridge will work with the customer to determine a suitable payment arrangement based on that customer's circumstances and will also allow for multiple payment arrangements in a year. Enbridge believes that imposing timelines for payment arrangements is not in the best interest of the customer over the longer term and creates an artificial budget for the customer and promotes potentially overextending themselves even further. In addition, given that Enbridge will offer payment arrangements more frequently then this rule stipulates, the Company is more flexible now when working with customers and such a rule could limit the Company's ability to work with customers based on their circumstances. Enbridge's current policies and practices largely meet the intent of rule. Payment arrangements are currently collected on a timeline that has the payment arrangement cancelled 10 days after the first missed payment. Enbridge currently issues a friendly reminder call to customers 1 day after a payment is missed, then a subsequent call 5 days later with the payment arrangement being cancelled on the 10th day.	
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8. Management of Customer Accounts: Support constructive third party involvement and protects customers and distributors from fraud and misunderstandings.

Customer Service Rules for Electricity Distributors	Existing policies and practices	Proposed modified policies and practices
If a distributor opens a new account based on a request from a third party, a letter must be sent to the new user within 15 days of the opening of the account. The account will not be set up if the new user has not approved the opening of the account within 15 days of the letter. However, a solicitor or person with Power of Attorney can agree on behalf of the new customer to the opening of the account. Distributors can only recover charges from a person who has agreed in writing to become a customer. When a tenant customer moves out of a rental unit, distributors cannot seek to recover future charges from any other person, including the landlord, unless that person has agreed in writing to assume responsibility for the account. A distributor and a landlord may enter into an agreement where the landlord agrees to automatically assume responsibility for paying for continued service after the closure of a tenants account.	Enbridge's current policies and practices are different from this rule. New accounts are opened via lawyers' letters from either parties' lawyer (in the event of a move) or by customer's request. If a customer moving out or their lawyer has notified the Company of a pending move, and the moving in party has not contacted the Company, an account in the name of "Owner Occupant" is created and bills are issued to the address. Attempts are made to validate the customer's information at the premise through the use of door hangers or correspondence. Locking the premise would be a last resort. Obtaining written confirmation from the customer would add significant time and complication to the process of moving customers in and out of premises. This change would also result in an increase in backdated transactions and add significant risk to the Company for customers not communicating proactively. Enbridge's current policies and practices largely meet the intent of this rule. When a tenant moves out of a rental unit, the Company attempts to recover those charges from that customer, not any subsequent customer. If there is no move-in party, then Enbridge will attempt to recover future charges at the property from the landlord to avoid disconnection of the property. Arrangements are in place with some landlords where the account will go in the	Enbridge is proposing to maintain its current policies and practices but would consider a potential change to the handling of landlord properties. The Company is proposing to enter into landlord agreements to have the landlord assume responsibility for the charges at their property after a tenant has moved out or in the event that a new tenant has not contacted the Company with their personal information. Clear accountability will reduce complaints over the responsibility for the account. Such changes will require updates to the system and updates to training and process documentation.

	name of the landlord and charges billed to the landlord if there is not tenant to avoid disconnection.	
Comments or Suggestions		

**Related Links**

Helping you get the assistance you need is important to us. [Watch our video.](#)

Customer Assistance

If you have a problem or concern, contact us and we'll do our best to resolve it quickly and conveniently.

STEP 1: Give Us a Call

Our Customer Service Representatives (CSRs) are trained to help with your concerns and questions.

In most cases, they'll have the answers you need.

Contact us directly by:

Telephone

Reason	Number
You smell gas or have an emergency.	1-866-SMEL-GAS (1-866-763-5427)
You have questions about your billing information, or you have concerns about an inspection or a gas meter.	1-877-Enbridge (1-877-362-7434)

Mail

If you'd prefer to write to us, please include a written summary of your problem and your full name, address and telephone number.

If you send more than one letter, please include your contact information on each one.

Our address is:

Customer Resolution

500 Consumers Road
North York, ON
M2J 1P2

STEP 2: Ask to Speak to a Supervisor

If you feel that your problem has not been appropriately resolved by one of our CSRs, please ask to speak to a manager or supervisor.

The CSR will arrange for a manager or supervisor to contact you within 48 hours to discuss your situation.

The supervisor or manager will work with you to resolve your issue.

STEP 3: Contact our Customer Ombud



If after speaking with a CSR and a supervisor, you feel that your inquiry has not been appropriately addressed, you may contact the office of the Ombud to speak to a member of our team. The office of the Ombud will contact you to confirm receipt of your information—in most cases within 48 hours—and will review your issue as soon as possible.

You may contact a member of the Ombud team directly via telephone or email at:

Mail	Debbie Boukydis, Customer Ombud P.O. Box 650 Scarborough, Ontario M1K 5E3
Email	ombud@enbridge.com
Telephone	416-495-6155
Toll Free	1-866-817-6836
Fax	416-495-5021

Claim Inquiries: Any claims issues that may be subject to a claim inquiries that have not already been sent to the Enbridge Claims Department will be forwarded to the Enbridge Claims Department. A member of the Enbridge Claims Department will contact you directly to review your issue as soon as possible. Once the Enbridge Claims Department has reviewed the issue and made a decision, you still have the option to have it reviewed by the office of the Ombud.

STEP 4: Contact the Ontario Energy Board

If you've followed the above steps and your problem has not been resolved, please contact the Ontario Energy Board (OEB).

To contact the OEB, go to www.oeb.gov.on.ca.

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