

Hydro One Networks Inc.

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Toronto, Ontario M5G 2P5
www.HydroOne.com

Tel: (416) 345-5700
Fax: (416) 345-5870
Cell: (416) 258-9383
Susan.E.Frank@HydroOne.com



Susan Frank

Vice President and Chief Regulatory Officer
Regulatory Affairs

BY COURIER

May 26, 2011

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

Dear Ms. Walli:

EB-2011-0021 – Hydro One Remote Communities Inc. Application for an Exemption from Sections 2.7.1.2, 2.7.2, and 7.10 of the Distribution System Code and Low-Income Energy Assistance Program – Applicant Responses to Interrogatory Questions

Please find attached an electronic copy of responses provided by Hydro One Remotes to Interrogatory questions. Two (2) hard copies will be sent to the Board via courier.

An electronic copy of the Interrogatories have been filed using the Board's Regulatory Electronic Submission System (RESS). The proof of RESS is attached.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank

1 **Ontario Energy Board (Board Staff) INTERROGATORY #1 List 1**

2
3 **Interrogatory**

4
5 Please provide a cost study where actual expenses incurred by Remotes as per current
6 practices of collection payment arrears, disconnection and reconnection of customers,
7 providing notices, etc. are compared with the potential expenses Remotes would incur if
8 it complied with the DSC requirements. Please structure your report by category of
9 expense.

10
11 **Response**

12
13 See Attachment 1

Summary Comparison of Current Practice vs. DSC Requirement by Category of Expense

Program Cost Comparison (Air/Road Access Combined)

	Current Practice (2010 Actuals)	DSC Requirement (Full Year)	Change - Notes
Administrative Labour (Office)	\$45,191	\$341,760	Collection activities related to notifications, management and execution of program require significant manual effort. 210 hours were required to perform this work in 2010, with two trips to each community per year. Although Remotes does not disconnect in the winter months, trips would be required to collect and to install load limiters/interrupters. It is estimated that 1,900 direct hours would be required to perform monthly trips year round.
Execution Labour (Trade)	\$147,859	\$1,118,208	Costs based on burdened hourly rates. 750 hours of direct work were required in 2010. It is estimated that over 5,590 direct hours would be required to perform monthly trips for year round collections.
Sundry (Flights)	\$130,900	\$764,987	Flights estimated to cost an average of \$4,904 per day. DSC rules could require two trips per week to each community. However, it is assumed that some cost synergies will be realized and only one trip to each community per month would be required for each month that collection activities occur. Cost synergies related to bundling other work with collection activities are not considered for DSC rules.
Trucks and Work Equipment (TWE)	\$8,061	\$97,920	Changes relate primarily to road/rail sites. Currently, field staff perform other activities when engaged in collection work in road/rail communities. It is assumed that TEW costs will be specifically allocated to collections.
	\$332,012	\$2,322,875	
Gross Difference vs. Current Practice		\$1,990,862	
Percentage Increase vs. Current Practice		600%	

1 **Ontario Energy Board (Board Staff) INTERROGATORY #2 List 1**

2
3 **Interrogatory**

4
5 Please confirm that customers of Remotes are provided with a disconnection notice prior
6 to disconnection that contains all information required by section 4.2.2 of the DSC.
7 Please provide a sample of such disconnection notice.

8
9 **Response**

10
11 Please see Attachment 1 and 2; examples of the disconnection notice letter, which is sent
12 twice, a month apart, to the customer. Note that Remotes accepts any form of payment
13 during the notice period and while in the field for collections. Due to the long notice
14 period, specific amounts outstanding are not included in the letter but are available from
15 the billing department or field staff. Critical care customers are not subject to service
16 disconnection and are normally identified by the Band Council when notice is sent to the
17 Band Council.

Hydro One
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Thunder Bay On P7E 6G9
www.HydroOne.com

Tel: (807) 474-2800
Fax: (807) 475-8123
Billing Toll Free: 1-(800) 465 5085

March 9, 2011

Big Trout Lake, ON P0V 1G0

Re: Past Due Account # 00000-00000– XX Big Trout

Every Hydro One customer is responsible for paying the electricity used at their home or business. Disconnection and reconnection of electric service for non-payment of an account is inconvenient and costly to both Hydro One Remote Communities Inc. and our customers. Therefore, it is our policy to give ample opportunity in which to pay accounts, and to assist customers in making arrangements to pay their accounts.

Our records indicate the above noted account is past due and a substantial balance remains outstanding. Please refer to your current bill for total arrears. We regret it may be necessary to interrupt your service if the account remains in arrears during **the disconnection trip** scheduled for **sometime during the week of April 25th, 2011**. Our field staff will not be making any pay arrangements with customers once in the Community. **When you receive this letter**, now is the time to call the Billing Office at 1-800-465-5085 to make payment arrangements. **Alternately, you must confirm full payment of arrears by Friday, April 22nd**. **Payments can be made by credit card (master link cards), money orders, internet or telephone banking. It is important to keep your account current to avoid disconnection and late payment charges. If we do not hear from you and your account is still in arrears during the trip, disconnection will take place whether or not you are at the property.** A charge of \$65.00 each will be applied to your account for any applicable disconnection and reconnection trips. **Please note that your electrical main breaker must be in the off position before reconnection can take place.** If the breaker is still on when the crew is there to reconnect, they will leave the power off, and an additional \$65.00 trip charge will be added to your account. Reconnection will take place at a later date once the breaker is confirmed off.

You should also be aware that Hydro One will assume no responsibility for any damages resulting from power not being available to operate your equipment during the period of such disconnection. Even though the service is disconnected, the normal monthly service charge applicable to your service will continue to apply. After six months, the service will be cancelled and the account finalised. For reconnection, an electrical inspection will be required and new service connection fees will apply.

We trust these actions will not be necessary and that you will forward your payment immediately. The Hydro service is still subject to disconnection if you default on payments agreed upon.

Thank you.

Claudia – Customer Care Team Lead
Hydro One Remote Communities Inc.

Hydro One
Remote Communities Inc.
680 Beaverhall Place
Thunder Bay On P7E 6G9
www.HydroOne.com

Tel: (807) 474-2800
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Billing Toll Free: 1-(800) 465 5085

Filed: May 26, 2011
EB-2011-0021
Exhibit I-2-2
Page 1 of 1



April 6, 2011

Customer Name
Box Number
Big Trout Lake, ON P0V 1G0

Re: Past Due Account # 0000-00000 – XX Big Trout

Every Hydro One customer is responsible for paying the electricity used at their home or business. Disconnection and reconnection of electric service for non-payment of an account is inconvenient and costly to both Hydro One Remote Communities Inc. and our customers. Therefore, it is our policy to give ample opportunity in which to pay accounts, and to assist customers in making arrangements to pay their accounts.

Our records indicate the above noted account is past due and a substantial balance remains outstanding. Please refer to your current bill for total arrears. We regret it may be necessary to interrupt your service if the account remains in arrears during **the disconnection trip** scheduled for **sometime during the week of April 25th, 2011**. Our field staff will not be making any pay arrangements with customers once in the Community. **When you receive this letter**, now is the time to call the Billing Office at 1-800-465-5085 to make payment arrangements. **Alternately, you must confirm full payment of arrears by Friday, April 22nd**. **Payments can be made by credit card (master link cards), money orders, internet or telephone banking. It is important to keep your account current to avoid disconnection and late payment charges. If we do not hear from you and your account is still in arrears during the trip, disconnection will take place whether or not you are at the property.** A charge of \$65.00 each will be applied to your account for any applicable disconnection and reconnection trips. **Please note that your electrical main breaker must be in the off position before reconnection can take place.** If the breaker is still on when the crew is there to reconnect, they will leave the power off, and an additional \$65.00 trip charge will be added to your account. Reconnection will take place at a later date once the breaker is confirmed off.

You should also be aware that Hydro One will assume no responsibility for any damages resulting from power not being available to operate your equipment during the period of such disconnection. Even though the service is disconnected, the normal monthly service charge applicable to your service will continue to apply. After six months, the service will be cancelled and the account finalled. For reconnection, an electrical inspection will be required and new service connection fees will apply.

We trust these actions will not be necessary and that you will forward your payment immediately. The Hydro service is still subject to disconnection if you default on payments agreed upon.

Thank you.

Claudia – Customer Care Team Lead
Hydro One Remote Communities Inc.

1 **Ontario Energy Board (Board Staff) INTERROGATORY #3 List 1**

2
3 **Interrogatory**

4
5 Please explain whether Remotes had developed a consistent schedule that outlines
6 specific timelines for collection payments arrears, disconnection and reconnection of
7 customers, providing notices, etc. that has been coordinated and approved by local Band
8 Councils and is followed by Remotes year on year.

- 9
10 a) If such schedule exists, please provide side by side comparison with timelines
11 required by the DSC for the same steps.
12
13 b) If such schedule does not exist, please explain how such timelines are established,
14 frequency of changes and coordination and approval process with local Band
15 Councils.

16
17
18 **Response**

- 19
20 a) Please see Attachment 1 for a comparison of timelines with the DSC.
21
22 b) Band Councils are faxed the dates for 2 collection trips (spring and late summer) in
23 mid January. Approximately two months before the trip, the Band Council is faxed a
24 poster notifying community members of the week of the disconnection trip. One
25 month before the collection trip, the Band Council is faxed a list of customers who
26 will be disconnected if payment is not received. . The list is updated and faxed to the
27 Band Council weekly as payments are made. The dates for collection trips can be
28 changed at any time during the process. Please see Attachment 2 for samples of
29 correspondence responding to requests to reschedule trips in 2010 and 2011.
30

Residential - Active Collections Timeline DSC Rules																										
Calendar Date	30-Dec	31-Dec	18-Jan	28-Jan	3-Feb	11-Feb	16-Feb	17-Feb	1-Mar	2-Mar	3-Mar	10-Mar	17-Mar	18-Mar												
Billing Cycle	Day 0	Day 1	Day 14	Day 20	Day 23	Day 29	Day 32	Day 33	Day 42	Day 43	Day 44	Day 49	Day 54	Day 55												
Bill Batch Date	Bill Print Date	Date Payment Due	LPC GPH Review	DNL Print	DNL Received	New start of 10 day payment period to customers	Minimum Notice Period	Eligible to Cut List	Earliest date of disconnect	Valid Disconnection Notice	Accounts expire from cut list 5 days before latest date of disconnect	Last date of disconnect	DNL Expired - Cannot Disconnect													
															Valid DNL Period 11 business days from last date of minimum notice period											
															Deemed Received 3 business days deemed received (Code specified business days)											
															Minimum Notice Period 10 (business days)											
Remote Residential - Active Collections Timeline																										
Calendar Date	30-Dec	31-Dec	18-Jan	28-Jan	3-Feb	11-Feb	16-Feb	17-Feb	1-Mar	2-Mar	3-Mar	7-Mar	10-Mar	17-Mar	18-Mar	25-Mar	26-Mar	1-Apr	4-Apr	6-Apr	12-Apr	21-Apr	26-Apr	29-Apr	Day 84	
Billing Cycle	Day 0	Day 1	Day 14	Day 20	Day 23	Day 29	Day 32	Day 33	Day 42	Day 43	Day 44	Day 46	Day 54	Day 55	Day 60	Day 61	Day 65	Day 66	Day 68-72	Day 79	Day 80	Day 83	Day 84			
Bill Batch Date	Bill Print Date	Notice of annual trips to First Nation Band Council	Date Payment Due	LPC GPH Review					Poster faxed to Band Council to translate & post				Customer DNL printed Band Council and faxed Disconnect List	DNL list and Radio Ads Received by Band Council	DNL Received by customer Radio Notices Begin	Start of Notice Period Band Council Faxed Updated Disconnect List	Second DNL Printed	Third Notice Disconnect List faxed to Band Council Updated Poster with Date	Earliest Date of disconnect	Valid Disconnection Notice	Trip can be rescheduled due to weather or discussions with Band Council	Last date of disconnect	DNL Does Not Expire, Trip Can Be Rescheduled			
															First DNL to customers who have not paid in over 60 days, one calendar month in advance, of collection trip. Estimated time for letters to reach most customers 5 business days											
															Concurrent Radio Notice Radio ads informing customers of pending Disconnection Trip 3 weeks before trip (Normally 15 business days)											
															Minimum Written Notice											
															DNL Period Normally 5 days, but trip can be rescheduled. Notification of new date is sent to Band Council, who post the new date and play radio ads											

Fort Severn First Nation

P.O. BOX 149
FORT SEVERN, ONTARIO P0V 1W0
TEL: (807) 478-2572 FAX: (807) 478-1103

Hydro One
Remote Communities Inc.
680 Beaverhall Place
Thunder Bay, On
P7E 6G9

May 25, 2010

Attention: Scott

Re: Disconnection Trip

On behalf of the community, We the Chief and Council are requesting to change your disconnection trip on May 31,10 to the second week of June. The majority of people on the list have come forward to inform us that they will have the full payment on the first week of June 2010. Many are short only a couple of hundred dollars.


Our payroll for our employees and welfare clients will also receive their cheques on the first week of June. After the people get their cheques. The people on the list shouldn't have problems with their hydro accounts.

We would like to Thank you in advance for your time and consideration on this important request.

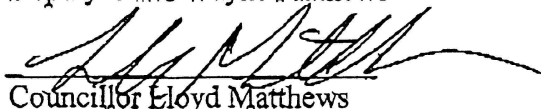
If you have any questions or concerns please contact the chief or council on the above phone numbers

Fort Severn First Nation


Chief Matthews Kakekaspa


Deputy Chief Wayne Mathews


Councillor Rex Thomas


Councillor Eloyd Mathews

*Victoria
Mathews
Resource Worker
Band office*



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Operations Toll Free: 1-888-825-8707



May 27, 2010

File: 520.11 Fort Severn FN

Attention: Chief David Matthews & Council

Re: Hydro One Collection Trip for Thursday, June 10, 2010

As per your letter dated May 25, 2010 signed by Chief and Council, we are pleased to be able to accommodate your request to move the disconnection trip back to the 2nd week in June. It has been re-scheduled for Thursday, June 10, 2010. It is our understanding that employees of the Band, and welfare clients will receive their cheques the first week of June and should be able to make their payments for their hydro accounts at that time.

Attached is a notice for posting and the collection list to date. I should note that as in previous collection trips, the field collection crews won't be making any payment arrangements or collections with customers in the field. They will advise the customers to contact the billing office at 1-800-465-5085 for this purpose. Customers who have made previous arrangements and defaulted on these payments, as well as customers who have balances outstanding will be subject to service disconnection. Our shared objective is to avoid the need for service disconnection.

Sincerely,

Claudia- Customer Care Team Lead
Hydro One Remote Communities Inc.



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Operations Toll Free: 1-888-825-8707



CONFIDENTIAL

May 13, 2011

File: 520.11 Sachigo Lake FN

Attention: Chief Titus Tait & Council

Re: Change of Date - Hydro One Disconnection Trip now on Tuesday, May 17, 2011

Due to bad weather conditions, we were unable to fly into Sachigo Lake on Thursday, May 12, 2011. After discussions with Jack Tait today, we have re-scheduled the disconnection trip to be on Tuesday, May 17, 2011. This should be beneficial to customers in that they now have an opportunity to pay their bills, as we were informed that Thursday May 12/11, was payday for many. Customers are encouraged to call in to the Billing Department at 1-800-465-5085 to report their payment and get removed from the disconnection list.

As with previous disconnection trips, the crew will be in the Community to perform disconnections only. Attached is an up-to-date list. They will not be making any payment arrangements with customers in the field. Customers who have made previous arrangements and defaulted on these payments, as well as customers who have balances outstanding will be subject to service disconnection. Our shared objective is to avoid the need for service disconnection.

Sincerely,

Claudia – Customer Care Team Lead
Hydro One Remote Communities Inc.

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #1 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries concerning Remotes and EB-2007-0722**

6
7 Hydro One Remote Communities Inc. (“Remotes”) has stated that it requires exemptions
8 from specific sections in the Distribution System Code (“DSC”) identified in the EB-
9 2007-0722 Notice dated February 8, 2011. What status, if any, did Remotes seek in
10 respect of the proceeding in EB-2007-0722 to provide its comments and outline its
11 concerns about the proposed amendments to the DSC after the Ontario Energy Board
12 (“OEB”) provided notice of its consultation process on September 6, 2007?

13
14 **Response**

15
16 Hydro One Networks sought participation in this proceeding on September 17, 2007.

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #2 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries concerning Remotes and EB-2007-0722**

6
7 Was Remotes a member of the Electricity Distributors Association (“EDA”) in
8 September 2007 and thereafter? Is Remotes currently a member of the EDA?

9
10 **Response**

11
12 Yes, Remotes was a member of the EDA in September, 2007 and thereafter. Remotes is
13 currently a member of the EDA.

14

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #3 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries concerning Remotes and EB-2007-0722**

6
7 Did Remotes file any material with the OEB in respect of EB-2007-0722 to object to any
8 of the proposed amendments to the DSC? If so, please provide copies of such filings.

9
10 **Response**

11
12 Remotes filed a letter on March 1, 2011 (Attachment 1) supporting the comments from
13 Hydro One Networks regarding further amendments to the DSC issued by the OEB on
14 February 8, 2011.

15

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Susan.E.Frank@HydroOne.com



Susan Frank

Vice President and Chief Regulatory Officer
Regulatory Affairs

BY COURIER

March 1, 2011

Ms. Kristen Walli
Board Secretary
Ontario Energy Board
2300 Yonge St., Suite 2700
Toronto, ON,
M4P 1E4

Dear Ms. Walli,

**EB-2007-0722 – OEB Revised Proposed Code Amendments Regarding Customer Service –
Comments from Hydro One Remote Communities Inc. on the Revised Updated Proposed Low-
Income and Other Customer Service**

Hydro One Remotes Communities Inc. (Remotes) supports the submissions of Hydro One Networks on the Revised Updated Proposed Low-Income and other Customer Service Amendments to the Distribution System Code, the Retail Settlement Code and the Standard Service Supply Code issued February 8, 2011.

Remotes requests that the Board consider its updated application for exemptions from several of the DSC amendments filed on March 1, 2011 (EB-2011-0021 – Remotes Application for an Exemption from Sections of the DSC) when it is finalizing these amendments to the DSC.

Please direct any questions related to this application to Ruth Greey at 416 345-6408 or ruth.greey@hydroone.com.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #4 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries concerning Remotes and EB-2007-0722**

6
7 Did Remotes file any material with the OEB in respect of EB-2007-0722 to request an
8 exemption to any of the proposed amendments to the DSC? If so, please provide copies
9 of such filings.

10
11 **Response**

12
13 Remotes filed a request for exemptions from nine sections of the DSC on March 1, 2011,
14 which is now being considered through this process, EB-2011-0021.

15

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #5 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries concerning Remotes and EB-2007-0722**

6
7 Did any other organization, including the EDA or Hydro One Networks (“HON”),
8 represent the interests of Remotes in EB-2007-0722 in respect of the proposed
9 amendments to the DSC? If so, please identify the organization.

10
11 **Response**

12
13 Hydro One Networks participated in this proceeding and had assumed given the unique
14 circumstances of Remotes that any amendments would recognize the need to modify the
15 requirements for Remotes.
16

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #6 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries concerning Remotes and EB-2007-0722**

6
7 The EDA made a number of submissions to the OEB in respect of EB-2007-0722, after
8 advising the Board that it had consulted with its members. If the EDA was not
9 representing the interests of Remotes in respect of EB-2007-0722, did Remotes ever
10 advise the OEB that EDA's submissions did not represent the interests and concerns of
11 Remotes?

12
13 **Response**

14
15 No.

16

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #7 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries concerning Remotes and EB-2007-0722**

6
7 Remotes is a subsidiary of HON. HON made a number of submissions to the OEB in
8 respect of EB-2007-0722. If HON did not represent the interests of Remotes in respect of
9 EB-2007-0722, did Remotes ever advise the OEB that HON's submissions did not
10 represent the interests and concerns of Remotes?

11
12 **Response**

13
14 No.

15 Note that Hydro One Remote Communities Inc. and Hydro One Networks Inc. are both
16 subsidiaries of Hydro One Inc. Hydro One Remote Communities Inc. is not a subsidiary
17 of Hydro One Networks Inc.

18

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #8 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries concerning Remotes and EB-2008-0150**

6
7 In July 2008, the OEB advised that it was initiating a consultation process to provide an
8 opportunity for interested parties to make presentations on a variety of low income
9 energy issues, and submit written comments following a stakeholder conference. That
10 process was part of EB-2008-150. The OEB's consultation process had been prompted by
11 the Divisional Court's May 2008 decision in *Advocacy Centre for Tenants-Ontario v.*
12 *Ontario Energy Board*, which confirmed the OEB's jurisdiction to consider the "ability to
13 pay" when setting utility rates.

14
15 A stakeholder conference was subsequently held at the OEB's offices from September 22
16 to 25, 2008, during which participants were given the opportunity to make presentations
17 on a variety of issues, including (a) whether the OEB should implement policies,
18 programs or other measures designed to assist low-income energy consumers, (b)
19 whether there were programs already in place among distributors to assist low-income
20 energy consumers, and (c) what customer service issues (e.g. payment periods,
21 disconnection rules, security deposits and specific service charges) were of particular
22 relevance and what arrears management programs were in effect in Ontario or abroad.

23
24 As a result of the stakeholder conference, OEB Staff released a report to the Board in
25 February 2009. The report covered the very issues that were incorporated into the
26 amendments to the DSC from which Remotes now seeks exemption. Further, on March
27 10, 2009, the Board released a Report on the Low-Income Energy Assistance Program.
28 With respect to the above:

- 29
30 a) Did Remotes request the right to participate in the OEB's consultation process?
31 b) Did Remotes attend the September 2008 stakeholder conference? If Remotes attended
32 the conference, did Remotes make any representations or voice any concerns or
33 objections about any of the proposals relating to low-income energy consumers?
34 c) If so, what were the representations, concerns, or objections of Remotes? Please
35 provide any relevant documents outlining any such comments, concerns, or
36 objections.
37 d) If Remotes did not attend the stakeholder conference, why did it not do so?
38

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2
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10

Response

- a) Hydro One Networks participated in this process.
- b) Hydro One Networks attended the September 2008 stakeholder conference. Hydro One Networks voiced concerns about proposals related to low-income energy consumers.
- c) Hydro One Networks assumed given the unique circumstances of Remotes, that any amendments would recognize the need to modify the requirements for Remotes.
- d) N/A

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #9 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries concerning Remotes and EB-2008-0150**

6
7 After the OEB released its Staff Report to the Board in February 2009, did Remotes offer
8 any comments, or voice any concerns or objections to any proposals relating to the low-
9 income energy consumers which eventually became the amendments to the DSC (from
10 which Remotes now seeks exemption)? If so, what were those comments, concerns, or
11 objections?

12
13 **Response**

14
15 Please see Attachment 1 which was filed in response to the February 2009 OEB Staff
16 Report to the Board.

17

April 17, 2009

BY COURIER

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

Dear Ms. Walli:

**EB-2008-0150 – OEB Consultation on Energy Issues Relating to Low Income Consumers:
Comments of Hydro One Remote Communities Inc. on the Board Proposed Low-Income
Energy Assistance Program**

Hydro One Remote Communities Inc. (“Remotes”), in response to the Ontario Energy Board’s (“The Board”) March 10th, 2009 Report on the Low Income Energy Assistance Program (“LEAP”), wishes to indicate that it will be seeking an exemption from the requirements of this program, when it is put into effect. Remotes’ agrees with the intent and spirit of the program, but believes that, as most of its customers are defined as low income consumers it would be inappropriate to increase their rates to provide the funding support for other low income customers in Ontario.

Remotes’ Customer Base and the Role of RRRP

Most of the customers in Remotes’ service territory are low income consumers. Based on the 2005 Statistics Canada information that is available for the First Nation communities in Remotes’ service territory, the median after-tax income for all families ranges from \$25,024 to \$37,683 -- significantly lower than \$59,377, the median after-tax income reported for all families in Ontario for that year.

Because Remotes’ customers are mainly low income, Remotes does not support increasing rates in its service territory to offer support to low income customers. Furthermore, these rates are sustained at these levels through subsidy provisions under the Rural and Remote Rate Protection (“RRRP”).

Remotes’ Current Customer Service Provisions

Remotes’ residential customer service practices have been designed to work with low income consumers. The Company’s collections practices have also been changed and improved through many years of discussions with local band councils and social service offices in our communities.

Remotes' performs two collection trips a year in each community. Collection trips are performed from April to October, as the Company does not disconnect customers over the winter months.

Six notifications will be issued prior to any disconnection. The first notice is sent to the local band council and to individual customers two months in advance of the trip. These notices offer customers an opportunity to negotiate payment arrangements and urge customers to contact the Company's Thunder Bay office. Informing the band councils also means that Remotes is made aware of individual circumstances where more sensitivity is required. Further notifications are sent closer to the trip date, and payment plans may be negotiated until the trip itself. The Company also notifies the social service office of the date of the collection trip so they can work with clients.

Remotes' regularly negotiates payment arrangements with customers, and has found that customers tend to respond best to payment arrangements spread over no more than four to six months. The Company already has a high level of arrears. Extending the payment time to 300 days would exacerbate this problem and again, would increase costs to RRRP, with the consequent implications for electricity rate payers throughout the rest of the Province.

Conservation and Demand Management ("CDM") Programs

Remotes has partnered with the OPA to deliver an overall conservation program, designed to develop sustainable conservation through the development of local expertise and community buy-in. Understandably, the OPA is primarily focused on customers connected to the grid, and therefore, Remotes will continue a CDM program funded through its revenue requirement, as a key aspect of meeting its customer energy requirements and achieving cost efficiencies. A critical aspect of the program design, accordingly, will be its applicability to low income customers.

Conclusion

The Company believes that its current practices, as discussed above, already accomplish the intent of the Board's proposed LEAP program. Accordingly, the Company will request an exemption from the specifics of this program at an appropriate future date.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #10 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries concerning Remotes and EB-2008-0150**

6
7 In its Report to the Board on the Low-Income Energy Assistance Program (March 10,
8 2009), the OEB stated that stakeholders who participated in EB-2008-150 “expressed a
9 desire for more consistent treatment of low-income energy consumers across the
10 province, regardless of where they live, the fuels they use or the distributor serving
11 them...[and that the] Board believes it is important that there be a comprehensive and
12 province-wide approach to assisting low-income energy consumers.”

13
14 Given such information, including the Board’s stated position, why does Remotes submit
15 in its materials filed on March 1, 2011 that its existing collection practices (for which it
16 seeks exemption from the DSC) “are designed to meet the intent of the Board’s changes
17 to the DSC.” Specifically, how will exemption from the DSC sections cited in Remotes’
18 Notice of Application accomplish the following:

- 19
20 a) promote and result in more consistent treatment of low-income energy consumers
21 across the province;
22 b) achieve the Board’s stated objective of having a comprehensive and province wide
23 approach to assisting low-income energy consumers (e.g. by establishing province-
24 wide minimum standards in the DSC); and
25 c) meet the intent of the Board’s changes to the DSC.

26
27 Please explain by providing reasons.
28

29
30 **Response**

31
32 With respect to the LEAP customer service measures, page 12 of the Board’s March 10,
33 2009 Report states:

34
35 The second component of LEAP is access to more flexible and tailored
36 customer service rules. While LEAP makes emergency financial
37 assistance available, the Board believes that customer service measures
38 that allow low-income energy consumers to better manage their bill
39 payments will lessen the need for financial assistance, and allow
40 distributors to more effectively manage collections, bad debt and
41 disconnection/connection costs.

42
43 Remotes notes that the Code amendments try to balance the interests of Distributors to
44 manage collections, disconnections and bad debt with the interests of customers who

Filed: May 26, 2011

EB-2011-0021

Exhibit I

Tab 2

Schedule 10

Page 2 of 2

1 need more time to pay. As illustrated in Exhibit I, Tab 1, Schedule 3, following the
2 standard collection timeframes established in the Code would give its customers less time
3 to pay and less notice of disconnection.
4

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #11 List 1**

2
3 **Interrogatory**

4
5 **Reference: General inquiries relating to Remotes' submissions to the OEB**

6
7 Has Remotes taken any steps to comply with any DSC amendments which came into
8 effect on October 1, 2010, January 1, 2011, or April 1, 2011, as the case may be? If so,
9 please identify the specific steps which have been taken to ensure compliance with the
10 new DSC rules.

11
12 **Response**

13
14 See Attachment 1

15

1-02-11 Status of Implementation of DSC Amendments

Section	Status	In Force Date
2.4.10	Remotes has implemented this policy.	Jan, 2011
2.4.17	No change required. Remotes' security charges for residential are based on remote community averages for consumption (differs depending on whether the house uses electrical heat) and include an amount to cover the billing period plus 30 days. Remotes' Residential customers are billed monthly.	Jan, 2011
2.4.20A	Remotes permits residential customers to pay security deposits in equal instalments.	Jan, 2011
2.4.22A	Remotes is compliant with this requirement.	Jan, 2011
2.4.23A	Remotes is compliant.	Jan, 2011
2.4.25A	No action required. Remotes does not adjust its security deposits upward based on actual bills.	Jan, 2011
2.4.26A	The application of deposits to outstanding arrears was implemented in January, 2011. At this time, Remotes does not request repayment of security deposits.	Jan, 2011
2.4.6B	At this time, Remotes is not requiring customers to repay security deposits.	Jan, 2011
2.6.1	This billing change was made in January 2011.	Jan, 2011
2.6.2	This billing change was made in January 2011.	Jan, 2011
2.6.3	This billing change was made in January 2011.	Jan, 2011
2.6.4	This billing change was made in January 2011.	Jan, 2011
2.6.5	This billing change was made in January 2011.	Jan, 2011
2.6.6 2.6.6.2 2.6.6.2 2.6.6.3	No change required as Remotes does not issue bills for other goods and services with its energy billings.	Jan, 2011
2.6.7	This billing change was made in January 2011.	Jan, 2011
2.7.1	No change required.	Oct, 2010

2.7.1.1	Implemented October, 2010.	Oct, 2010
2.7.1.2	Not implemented. Exemption requested.	Oct, 2010
2.7.2	Not implemented. Exemption requested.	Oct, 2010
2.7.3	No change required.	Oct, 2010
2.7.4	No change required.	Oct, 2010
2.7.4.1	Implemented Oct, 2010.	Oct, 2010
2.7.4.1A	Implemented Oct, 2010.	Oct, 2010
2.7.4.1B	Implemented Oct, 2010.	Oct, 2010
2.7.4.2	Implemented Oct, 2010.	Oct, 2010
2.7.5	Not implemented. Remotes currently permits more than one payment agreement successively.	Oct, 2010
2.8.1	Not implemented. Exemption requested.	April, 2011
2.8.2	Not implemented. Exemption requested.	April, 2011
2.8.3	Implemented.	April, 2011
2.8.3A	Implemented.	April, 2011
2.8.4	Exemption requested from 2.8.1 and 2.8.1	April, 2011
2.8.4A	Exemption requested from 2.8.1 and 2.8.1	April, 2011
2.8.4B	Exemption requested from 2.8.1 and 2.8.1	April, 2011
2.8.5	No change required.	April, 2011
4.2.2	Implemented.	Jan, 2011
4.2.2.1	Implemented. (No change necessary).	Jan, 2011
4.2.2.2	Implemented (No change necessary).	Jan, 2011
4.2.2.2A	Implemented.	Jan, 2011
4.2.2.2B	Implemented.	Jan, 2011
4.2.2.3	Not implemented. Exemption requested.	Jan, 2011
4.2.2.4	Implemented. No change necessary.	Jan, 2011
4.2.2.5	Not applicable.	Jan, 2011
4.2.2.6	Implemented March 2011.	Oct, 2010
4.2.2.7	If SSA not going to assist, have 11 days to act on notice; also made 48 hour phone call.	Oct, 2010
4.2.3	No change necessary. Note: Remotes does not disconnect customers who provide documentation from a physician (or community nurse) when the disconnection poses a risk of adverse effects on the physical health of any person who	Jan, 2011

	regularly resides at the house.	
4.2.3.1	a) Not implemented. Exemption requested. b) Not applicable c) Not applicable d) Implemented.	Jan, 2011
4.2.4	Staff must be able to take a credit card payment during regular hours, when notice issues. And any time disconnect takes place.	Jan, 2011
6.1.2.1	Not implemented. Exemption requested.	April, 2011
6.1.2.2	Not implemented. Exemption requested.	April, 2011
6.1.2.3	No change required.	April, 2011
7.10.1	Not implemented. Exemption requested.	Jan, 2011
7.10.2	Not implemented. Exemption requested.	Jan, 2011

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #12 List 1**

2
3 **Interrogatory**

4
5 **Reference: General inquiries relating to Remotes' submissions to the OEB**

6
7 In its letter to the OEB, dated March 1, 2011, which forwarded Remotes' updated
8 Application for exemptions, Remotes stated in part that "Given the many areas where
9 Remotes requires exemptions from the Code [i.e. the DSC], Remotes requests that the
10 Board consider exempting Remotes from the DSC." In light of this statement, is Remotes
11 requesting that it be exempted from the DSC in its entirety? This is not clear to NAN.

12
13 **Response**

14
15 Due to the unique nature of Remotes' customer base and territory, Remotes is unable to
16 follow many of the standard practices outlined in the DSC. Remotes suggests that it
17 would be simpler and more efficient to exclude Remotes from the DSC and only include
18 it where appropriate.

19

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #13 List 1**

2
3 **Interrogatory**

4
5 **Reference: General inquiries relating to Remotes' submissions to the OEB**

6
7 Remotes notes in part 2 of its submission that the isolation of the communities it serves
8 limits economic opportunities, that most of Remotes' customers are economically
9 disadvantaged, they are low income, unemployment is high, the cost of consumer goods
10 is more expensive, and employment opportunities are mainly part-time or seasonal.
11 Given these factors, does Remotes agree that its residential customers are among the
12 poorest residents in Ontario? If so, are there reasons other than the "organizational cost
13 concerns" outlined in Remotes' submissions why Remotes does not want to be bound by
14 the minimum standards in the DSC rules recently introduced by the OEB?

15
16 **Response**

17
18 Other reasons for increased costs associated with implementing standard DSC rules for
19 collection activities include:

- 20
21 • customers getting less notice of disconnection;
22 • a less lenient interpretation of good payment history; and
23 • greater numbers of customers being disconnected for non-payment than is currently
24 the case.

25
26 Remotes is also concerned that its relationships with local Band Councils will deteriorate
27 if Band Councils do not have a say in the timing of collection trips.
28

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #14 List 1**

2
3 **Interrogatory**

4
5 **Reference: General inquiries relating to Remotes' submissions to the OEB**

6
7 In part 2 of its submission, Remotes states that approximately 40 per cent of Remotes'
8 customers do not have bank accounts, only about 50 per cent of Remotes' customers have
9 telephones and, although phone call can be made from the Band Office and messages can
10 be left there for residents, it is not possible to easily reach many residents by phone. What
11 is the source of Remotes' stated information on these issues? What measures has
12 Remotes taken in recent years to obtain contact information for residents using the
13 internet and to liaise with customers using email?

14
15 **Response**

16
17 Remotes bases its estimate of the number of customers with bank accounts on a customer
18 survey undertaken in 2005 that found that 40% (of customers) live in a household where
19 no one has a bank or credit union account.”

20
21 Remotes bases its estimate of the number of telephones in its communities on the number
22 of “current” phone numbers in its Customer Service System data base.

23
24 Hydro One is replacing its Customer Information System which will provide Remotes
25 with the capability to obtain email contact information for residents when the system is
26 implemented.

27

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #15 List 1**
2

3 **Interrogatory**
4

5 **Reference: General inquiries relating to Remotes' submissions to the OEB**
6

7 In part 3 of its submission, Remotes states that it has "developed collection practices that
8 respond to the needs of its customers and the unique challenges posed by the isolation of
9 its service territory." Please provide whatever information Remotes has relating to the
10 following issues:
11

- 12 a) Particulars of any consultation between Remotes and specific Band Councils
13 concerning the "collection practices" of Remotes described in its submission to the
14 OEB. In short, does Remotes have any evidence that the collection practices (i.e. the
15 payment arrangements, arrangements for the opening and closing of accounts, and
16 standard timelines which it has apparently been using since 2007) are the result of
17 consultation between Remotes and Band Councils in NAN communities? If so, please
18 provide details of the consultations which took place, including names of the
19 Councils, the dates and locations of such consultations, and provide copies of any
20 supporting documents to that effect;
- 21 b) Particulars of any agreements between Remotes and specific Band Councils relating
22 to Remotes' collection practices since 2007. In short, has Remotes ever provided a
23 written agreement to any Band Councils of its "collection practices" and requested
24 the Band Council to provide its consent or approval to such collection practices? If
25 so, please provide copies of such agreements.
- 26 c) Has Remotes ever provided a written description of the collection practices it has
27 apparently been using since 2007 to any Standard "A" and/or residential customers in
28 communities served by Remotes?
- 29 d) Did Remotes ever provide any written information to Band Councils, or to Standard
30 "A" or residential customers in the communities it serves, outlining the proposals of
31 the OEB to amend the DSC (which subsequently resulted in the DSC rules from
32 which Remotes now seeks exemption)?
- 33 e) Did Remotes ever advise any Band Councils, or Standard "A" or residential
34 customers, prior to March 1, 2011, that it was not in agreement with the amendments
35 to the DSC which resulted from EB-2007-0722 or EB-2008-1050? If so, provide
36 particulars of such notification, including copies of any relevant documents.
37

1 *Response*

2
3
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14

- a) The collection process was developed starting in 2004, with discussion and correspondence with Band Councils through to 2006. Examples of some of the correspondence and discussions are attached as Attachment 1. No letters of complaint have been received since 2006.
- b) No, Remotes does not have formal agreements with Band Councils regarding collections.
- c) Please see Attachment 2 for an example of the communication Remotes sends out each January to Band Councils. Please see Attachment 3 for an example of Remotes' annual communication to all customers of its collection practices.
- d) No.
- e) No.



Remote Communities Inc.

680 Beaverhall Place
Thunder Bay, Ontario
P7E 6G9
Tel: (807) 474-2800
Fax : (807) 577-1318

Billing: toll free 1-800-465-5085
Operations: toll free 1-888-825-8707



May 16, 2005

File: 450 Kasabonika General

Kasabonika Lake First Nation
P.O. Box 124
Kasabonika Lake, Ontario
P0V 1Y0

Re: Letter of April 20, 2005

Eno;

Remotes are pleased with the views of the Chief & Council and we support and intend to;

- 1.) Provide residential info (ie., the collection lists prior to trip) to Chief and Council.
- 2.) Work with social assistance administrator on an on-going basis.
- 3.) We will be in contact in regard to your suggestion of planned community education effort focused on demand management.

We feel our past practices have followed these processes, but we are always open to ways to improve our communication.

The following was action before and during our last collection trip.

1. Provided information about our dates of collection trip and collection list on March 10, March 29, April 7 and again on April 12, 2005.
2. Through out the process we also send out notices to the customers to call into office to make payment arrangements. We also sent letters to each customer with arrears on January 11 to 13, 2005 notifying them of the up coming trip.

We also want to ensure that customers contact Hydro One Remotes to keep current on their bills and realize that the Chief & Council is not responsible for these accounts, but only can provide support as their policies permit.

Hydro One Remotes has also listened to your community & others in regard to reading meters on monthly bases. To this affect Hydro One Remotes has selected your community to start monthly meter reading as discussed in our meeting of May 11, 2005.

In regard to your suggestion on education program on these matters, Hydro One Remotes has introduced a new program that could be of assistance to you and your community in this area. Sharon Pitawanakwat will contact you under a separate cover to arrange a suitable time to address this. Sharon can be reached at (807) 474-2835.

Regards,

Bob Shine
FLM – Lines/Customer Service
Hydro One – Remote Communities Inc.
Phone # (807) 474-2841 Cell # (807) 624-7184
Fax # (807) 577-1318

Cc: Jim Kirkpatrick
Claudia Nash
Sharon Pitawanakwat

Fax


To: Eno. H. Anderson Fax: 807-535-2605

From: Bob Shine Pages: 3

Date: April 28, 2005 Re: Response to April 20 Letter

Urgent For Review Please Comment Please Reply Please Recycle

● Comments:

Project: Minutes of Meeting		HYDRO ONE REMOTE COMMUNITIES INC.	
Document Name: Record of Meeting Template			
Division:	Version: 1.1	Effective Date: May 31, 2005	Page: 1 of 2

Purpose of Meeting: Sachigo Lake Collection/Connection Restriction

Thunder Bay – NAN

Date: December 19, 2005

Location: Office

Time Started: 3:00 pm

Time Ended: 5:15 pm

Participants

Invited	Attend	Regrets	Invited	Attend	Regrets
Chief Alvin Beardy	√		Robert Beardy - Councillor	√	
Deputy Chief Jack Tait	√		Helen Crowmarty - NAN	√	
Charles Barkman - Councillor	√		Jim Kirkpatrick	√	
Joe Tait – Band Administrator	√		Leo Tait - Councillor	√	
NAN Deputy Grand Chief - Alvin Fiddler	√		David Peerlan – NAN (part-time) 2 councillors and one other NAN rep	√	

Distribution List

Jack Coulis

Agenda

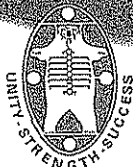
Topic #	Topics discussed
1.	First Nation concern regarding new connections/position on collection activity
2.	Hydro One's for connection restriction
3.	Scheduling of New Connections
4.	Rate Application

Comments / Discussions

1	Chief Alvin Beardy outlined the background on Chief and Council's position regarding collection activity (as described in their letter/resolution provided on November 2) and expressed concern over Hydro One not proceeding with new service connections for 4 new houses. NAN representatives at the meeting shared this concern.
2	Jim Kirkpatrick described the standard processes for obtaining new service connections and collection activity. Further to the letter(s) of November 4, November 11 and subsequent discussions with Chief Alvin Beardy, Jim Kirkpatrick explained the First Nation's resolution on collection activity was considered a restriction on regular business activity between Hydro One Remote Communities and Sachigo Lake First Nation. This had resulted in the restriction being placed on new service connections. Jim requested Sachigo Lake First Nation Chief and Council reconsider their position acknowledge that collection activity would not be restricted to one trip per year and that Hydro One must be able to carry out all aspects of our business associated with providing service to their community, including collection activity.
3	Jim K. offered the scheduling of the new connection work could proceed, once the current restriction on collection activity was removed. The earliest possible week would likely be the first week in January. The First Nation expressed concern over this timeframe.
4	Alvin Fiddler brought forward the recently published Notice of Rate Change and inquired into what impact this would have on the customer. Jim indicated that the rate for the average use customer was expected to be reduced due to the new rate structure being proposed. Alvin expressed concern regarding the timing and limited opportunity to respond during the Christmas season. Jim advised they should bring this forward to the OEB/Hydro One regulatory affairs contacts identified in the notice.

THIS DOCUMENT CONTAINS PROPRIETARY INFORMATION.

Do not disclose outside of Hydro One Inc. without the prior approval of the Manager



Nishnawbe Aski Nation

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100 Back Street, Unit 200, Thunder Bay, ON P7J 1L2
Tel: (807) 623-8228 Fax: (807) 623-7730 www.nan.on.ca

December 20, 2005

Honourable Donna Cansfield
Minister of Energy
Hearst Block
4th Floor, 900 Bay St
Toronto ON
M7A 2E1

Dear Minister Cansfield,

I am writing to request that you use your "good offices" during this holiday season to intervene as an act of compassion in a dispute between Hydro One Remote Inc. and the Sachigo Lake First Nation.

In November 2005, the Chief of the Sachigo Lake First Nation wrote to Hydro One Remote to request that a planned collection trip be deferred until the New Year. I am informed that there had been a change in Hydro One's collection practices that had not been effectively communicated with the First Nation and the First Nation was concerned that members would be without electricity during the winter months. In the letter the First Nation proposed a January 2006 meeting to discuss how communication and consultation could be improved with Hydro One remote. Coincidentally, the First Nation was at that moment requesting Hydro One remote hookup of 4 much needed new houses and 1 existing house.

Hydro One interpreted the First Nations November letter as an "impediment" to their normal business practices and refused to hookup the 5 houses, making the hookups contingent on the collection trip. We are very concerned about the linkage Hydro One Remote is making between collections and hook ups.

The new houses are now at risk of deteriorating as winter sets in.

To be clear, the First Nation in no way opposes the usual business practices including collection of Hydro One Remote. The dispute is one of process rather than principle. All the community is seeking is improved communications and a better way to work together with Hydro One. Further we are seeking to distinguish collection issues from connection or new service.

We are hoping that your intervention as a "stranger" to this dispute will be an act of preventative diplomacy that will resolve a situation that could easily escalate to the benefit of none.

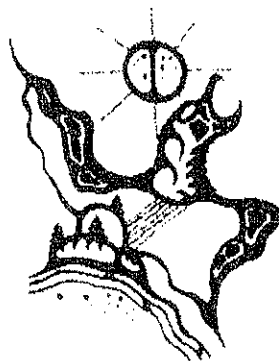
We look forward to your early reply.

Yours truly,

NISHNAWBE ASKI NATION

Alvin Fiddler
Deputy Grand Chief

cc Sachigo Lake First Nation Chief & Council
Windigo First Nations Council
Bob Rae, Partner, Goodmans LLP
John Zych, OEB Secretary



**Sachigo Lake First Nation
General Delivery
Sachigo Lake, Ontario
POV 2P0
(807)595-2527 or 595-2577**

December 21, 2005

Mr. James Kirkpatrick
Hydro One Remotes Communities Inc.
Thunder Bay, Ontario

Dear sir:

In our meeting of Dec. 19, 2005, my understanding of the outcome is as follows:

1. The hook up service will be conducted on the first week of January, 2006.
2. The collection service visits will be in April or May and the second visit will be July or August.
3. The letter of Nov 2005 is no longer applicable or relevant.
4. That we will meet again in early January to reassess and revise the protocol agreement to strengthen our working relationship and communications.

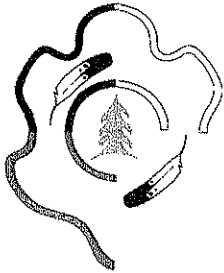
Sachigo Lake Council also acknowledges and respects the original agreements and protocols on the non-impeded delivery of hydro electrification services to our first nation.

I hope you concur with this summary

Yours truly
SACHIGO LAKE FIRST NATION

A handwritten signature in cursive script that reads "Alvin Beardy".

Chief Alvin Beardy



Hydro One Inc.
Remote Communities Inc.
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Thunder Bay, ON P7E 6G9
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Operations Toll Free: 1-888-825-8707

December 22, 2005

File: Sachigo

Sachigo Lake First Nation
General Delivery
Fort Severn, Ontario
P0V 1W0

Attention: Chief Alvin Beardy

Thank you for responding to our concern associated with the restriction on our collection activity in your community. I believe that providing acknowledgement of the requirement for the provision of all electrical service, without impediment, will address this concern. However, we need to clarify two of the points noted in your understanding of our Dec 19, 2005 meeting.

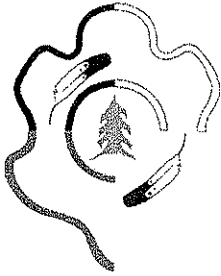
1. The new service connections are contingent upon meeting the standard conditions of service, as described in our September 6, 2005 correspondence with your housing coordinator (Ronald Tait). While most of these obligations have been met, I must note, the cheque for construction costs has not been received in our office.
2. The Nov, 2005 letter you make reference to is the resolution that had been brought forward by Sachigo lake F.N. Chief and Council in your letter of November 2, 2005.

Please contact me at (807) 474-2833 at your first opportunity in order to ensure we have a resolution of the issue at hand.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Kirkpatrick". The signature is written in a cursive, flowing style.

Jim Kirkpatrick
Operations and Maintenance Superintendent
Remote Communities



Hydro One Inc.
Remote Communities Inc.
680 Beaverhall Place
Thunder Bay, ON P7E 6G9
Tel: (807) 474-2800
Fax: (807) 577-1318
www.HydroOne.com
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Operations Toll Free: 1-888-825-8707

February 27, 2006

File: 520.11 – Sachigo Lake

Sachigo Lake FN
Box 51
SACHIGO LAKE, ON
P0V 2P0

Attention: Chief and Council

Re: Collection Trip Schedule and Arrangements

I am writing at this time to provide advance notification of collection activity within your community this coming year. We have scheduled two collection trips to each of the air access communities served by Hydro One Remote Communities. The initial Sachigo Lake collection trip would be in April, with a follow-up trip sometime during July.

Approximately one month prior to the collection trip, a letter will be sent to Chief and Council to inform you of the date and request your assistance with the logistical arrangements. At this time we will provide a written notice for posting, a radio announcement (text) and the initial collection list (a list of customer accounts that are in arrears). All customers on the initial list will receive a collection notification letter. The First Nation will be asked to translate and post the written notice and make the radio announcement during the 2-3 week period prior to the trip to encourage customers to pay their arrears or to make arrangements for payment.

Hydro One Remote Communities will confirm the details with the First Nation one week prior to the trip. At that time an updated collection list will be provided. I should note that in recent years, we have been putting more emphasis on the need for customers to contact billing office prior to community collection activity to make payments and/or payment arrangements. Our experience has shown that this provides for the most sensitivity and is an effective means for many customer's to address their energy account arrears.

We recognize the First Nation may be in a position to assist customer's within the collection process and would like to work with you prior to and during the collection trip wherever possible. We will not encourage customers to approach the Chief and Council as we have been requested not to do this by several communities. As in the past, our shared objective is to avoid the need to disconnect a customer's service for non-payment of arrears.

Sincerely,

Jim Kirkpatrick
Operations Manager (Acting)

*Original Signed
(have delivered Feb 28/06)*

Sachigo Lake First Nation

Sachigo Lake, Ontario

P0V 2P0

Ph. (807) 595-2527 595-2577 595-2528 595-2592

Fax (807) 595-1119

February 28, 2006

Hydro One Inc.
Remote Communities Inc.
680 Beaverhall Place
Thunder Bay, Ontario
P7E 6G9

03-28-06
MB

Attention: Jim Kirkpatrick, Operations Manager (Acting)

Re: Collection Trip Schedule and Arrangements

On behalf of our community, Chief and Council are responding to the advance notification of collection activity by Hydro One this year. The Chief and Council are acknowledging to the two scheduled collection trips each of the air access communities served by Hydro One Remote Communities. The collection trip(s), initial and follow-up to Sachigo Lake proposed by Hydro One is not possible, however, the month of June, on the 12 - 16 or 19 and 20, 2006 would be acceptable. The follow-up trip would be on the last week of September 25 - 29, 2006.

As per our explanation at a meeting with Hydro One, this is employment related with the beginning and wind down dates.

It is our understanding that approximately one month prior to the collection trip, a letter will be forwarded to Chief and Council informing the date and assistance with the logistical arrangements. At that time a written notice for posting, a radio announcement (text) and the initial collection list (confidentiality to clients will be a priority). All customers on the list will receive a collection notification letter. The First Nation will translate and post the written notice. Radio announcements will start February 28, 2006 with escalated announcements during the 2 - 3 week period prior to the trip to encourage customers to pay their arrears or make arrangements for payment.

It would be of great help for Hydro One Remote Communities to confirm the details with the First Nation one week prior to the trip as well as providing the updated collection list. First Nation will encourage customers to contact billing office to make payments and/or payment arrangements.

The First Nation may be in a position to assist customers within the collection process but Chief and Council will discourage assistance to the customers. This will be done through the communication process because they are given four months notice. The objective will be that arrears will be at a reasonable level where there will not be a collection trip.

Sincerely,



Chief Alvin Beardy

SACHIGO LAKE FIRST NATION



May 2, 2005

Sandy Lake FN
Box 12
SANDY LAKE, ON
POV 1V0

Attention: Chief and Council

Re: Hydro One Disconnection Trip Week of June 20, 2005

This will confirm the next disconnection trip to Sandy Lake is scheduled for the week of June 20, 2005. Customers who made pay arrangements and have defaulted on these payments, and customers who have balances outstanding will be affected. All customers are being mailed letters now notifying them of this upcoming trip. The crew will not be making any arrangements with customers in the field.

This trip should be announced on the radio prior to the week of June 20, 2005. We have attached a poster to be put up where the majority of people would see it.

Please contact this office if more information or a copy of the collection list will be required.

Thank you.

Hydro One Remote Communities Inc. .



POV IVQ

Phone: (807) 774-3421
(807) 774-5121
FAX: (807) 774-1040

May 13th, 2005

C.J. (Jack) Coulis, Director
Hydro One Remote Communities Inc.
680 Beaverhall Place
Thunder Bay, Ontario P7E 6G9

Dear Mr. Coulis,

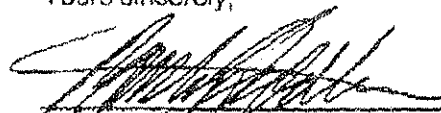

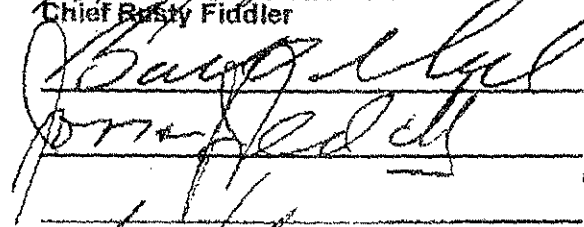
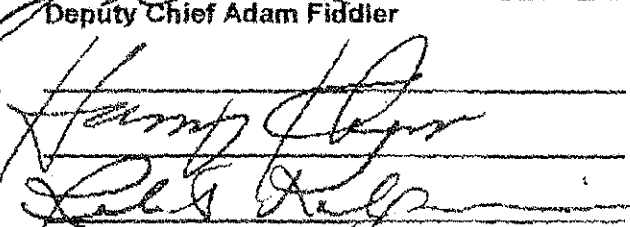
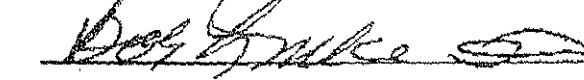

We are in receipt of the attached unsigned letter from Hydro One Remote Communities Inc. (HORCI) announcing their intention of visiting the community of Sandy Lake First Nation (SLFN) for the purpose of effecting disconnections on June 20, 2005. As indicated, those clients of HORCI who have defaulted on previous pay arrangements or those who have outstanding balances will be affected.

In the past, SLFN and HORCI have worked in concert to address the issue of delinquent accounts. Given the effort that HORCI and we are making to establish a new relationship for the future, the tone of this letter is questionable. The instruction that this should be "announced on the radio" and that "the poster should be put up were the majority of the people will see it" is seen to be presumptuous and not in keeping with the spirit of cooperation of the past.

We would like to remind HORCI that entrance upon the lands of the Sandy Lake First Nation requires the concurrence of the Chief and Council and is seldom withheld when permission has been requested. Currently, no such request has been received from HORCI. The letter also states that the crew will not be making any arrangements with customers in the field. This is a change from the recent practice. Chief and Council prefer to work with HORCI in the resolution of the delinquent account problem and in that context, we would see that a joint effort to publicize the problem, agree upon the process and set the timing of our collective efforts would be a more effective way to accomplish such a resolution to the problem.

Council interprets the attached letter as an instruction from HORCI not an invitation to cooperate. Please advise your staff accordingly. We are prepared to assist HORCI in working for an acceptable solution.

Yours sincerely,

	
Chief Rusty Fiddler	Deputy Chief Adam Fiddler
	
	

P.O. Box 268
 Webequie, Ontario
 P0T 3A0

Tel. (807) 353-6631
 Fax (807) 353-1218



WEBEQUIE FIRST NATION

April 27, 2005

By Fax: (807) 577-9430

Hydro One Remote Communities Inc.
 680 Beaverhall Place,
 THUNDER BAY, ON
 P7E 6G9

ATTN: Jack Coulis, Director

Dear Sir:

Thank you for the letter of notification regarding your intent to enter this community and disconnect Hydro.

I wish to advise you that a Band Council Resolution is in force prohibiting Hydro One Remote staff or any agent of Hydro One Remotes from entering into this community without the express written consent of the Chief and Council. As a result of this Band Council Resolution and with the full support of this community, I am informing you that you cannot enter this community.

Hydro One Remotes staff or agents are not allowed to enter into the reserve as per Band Council Resolution. Anyone or company are not allowed to enter into the reserve and may result in charges of trespass under the Indian Act or could be fined or further prohibit to enter into the reserve in the future.

Please be further advised that contrary to what you might have persuaded others to believe a large part of our rejection of you or your staff entering this community is based upon the continuing lack of respect shown by you to Webequie First Nation and the obvious lack of care or concern for First Nation people. You continue to act as if this is nothing more than a business transaction for you **but my community members are suffering**. Your response is to c.c. letters to Indian Affairs with the interference that we are the problem. You did not want to deal with us on the issues that we have faced over the years, therefore you are the big problem.

Please inform your staff that they should take the threat of arrest for trespass very seriously and further accept this letter as confirmation that the people and the Chief and Council of Webequie First Nation are no longer prepared to deal with you or any of your staff in the future. We will seek the appointment of a facilitator from your parent company.

Meegwetch,
 WEBEQUIE FIRST NATION

Chief Scott Jacob

c.c. First Nation Council



Hydro One Remote Communities Inc.
680 Beaverhall Place
Thunder Bay, ON P7E 6G9
Tel: (807) 474-2800
Fax: (807) 475-8123
www.HydroOne.com
Billing Toll Free: 1-800-465-5085
Operations Toll Free: 1-888-825-8707



January 22, 2010

File: 520.11 – Kingfisher Lake FN

Kingfisher Lake First Nation
Box 57
KINGFISHER LAKE, ON P0V 2Y0

Attention: Chief Mattias Winter & Council

Re: Disconnection Trip Schedule and Arrangements 2010

I am writing to provide advance notification of collection/disconnection activity within your Community this coming year. We have hard-scheduled two trips in 2010 with the initial visit scheduled for April, with a follow-up trip sometime during September. All overdue accounts are subject to disconnection during this period. Please note, if customer arrears remain high, a potential third trip into your Community may be necessary. Hydro One will provide Chief and Council with as much notice as possible should the need arise.

Approximately one month prior to the trip, a letter will be sent to Chief and Council to request your assistance with the logistical arrangements. At that time we will provide a written notice, plus the initial list of customer accounts that are in arrears. The customer list is also faxed to the Social Assistance Administrator. All customers on the list will have received a disconnection notification letter. To encourage customers to pay their arrears or to make arrangements for payment, the First Nation will be asked to translate and post the written notice where a majority of the members of the Community will see it, and on local television station Community Bulletin boards, (if applicable) as well as making radio announcements during the 2-3 week period prior to the trip.

Hydro One Remote Communities Inc. will confirm the details with the First Nation approximately one week before the trip. At that time an updated customer list will be provided. I should note that in recent years, we have been putting more emphasis on the need for customers to contact our billing office prior to community collection/disconnection activity to make payments and/or payment arrangements. Our experience has shown that this provides for the most sensitivity and is an effective means for many customers to address their energy account arrears.

We recognize that the First Nation may be in a position to assist customers in arrears, and we would like to work with you prior to and during the trip wherever possible. We will not encourage customers to approach the Chief and Council as we have been requested not to do this by several Communities. As in the past, our shared objective is to avoid the need to disconnect a customer's service for non-payment of arrears.

Thank you for your assistance in helping us ensure a smooth and effective process that encourages all customers to stay current in their energy accounts. If you have any questions, please feel free to contact our Billing Office at 1-800-465-5085.

Sincerely,

Claudia – Customer Care Team Lead
Hydro One Remote Communities Inc.



inside:

- Stay safe this summer
- Tips to save energy
- Low-cost cooling tips
- Collecting on Non-paying Accounts

Filed: May 26, 2011
 EB-2011-0021
 Exhibit I-02-15
 Attachment 3
 Page 1 of 2



Collecting on Non-paying Accounts

The cost of diesel fuel, shipping, transportation and the small size of our distribution systems makes the electricity Hydro One Remote Communities sells much more expensive than the price charged to Hydro One Network customers.

The Government of Ontario's Rural and Remote Rate Protection Fund makes it possible to charge most Remote Communities customers about the same price for electricity that people pay in the rest of Ontario. This fund pays for two thirds of the cost to produce electricity in the North. The other third is funded through the rates we charge to you, our customers.

If Hydro One Remote Communities' customers do not pay their electricity bills, our rates would have to increase to make up the shortfall. That's not fair to the people who pay their bills, and that's why we must collect outstanding balances when customers fall behind in paying their electricity bills.

Hydro One Remote Communities schedules at least two collection/disconnection trips to every community from April to September. Before every trip, we notify the local Chief and Band Councils and notify every customer who is behind on their payments and encourage them to call our billing office at 1-800-465-5085 to make payment arrangements. Our aim is to

always work with customers to develop payment plans to avoid disconnections.

Please note that during a disconnection visit, our employees are not able to negotiate payment options with you. They can only accept 100% of what is due to avoid disconnection.

We want to work with our customers to ensure they stay current on their accounts. If you fall behind, please call 1-800-465-5085 as soon as you can so we can set-up a payment plan for you.



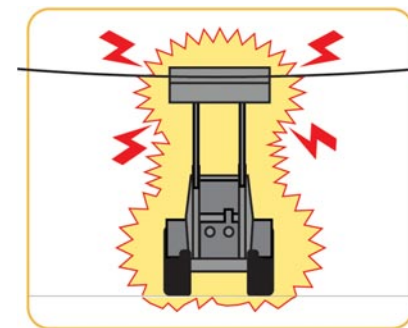
The high cost of shipping fuel by air and by winter road is one reason we must collect on past due electricity bills.



A 2011 winter road shipment destined for Hydro One in Sandy Lake.

Stay safe this summer

- Stay clear of overhead electrical wires. Don't touch them with the boom on a backhoe or any other piece of equipment. Anything that touches the line will conduct electricity and it could kill or injure you.
- When working on your home, stay away from the wires that connect your home to the hydro line.
- Fallen electrical wires are dangerous. Stay 10 metres away and report them right away to the number on the back of this publication.
- Inspect electric cords and replace them if you find any damage. Don't use electrical tools in wet areas and make sure they are plugged into outlets protected by Ground Fault Circuit Interrupters (GFCIs).
- Check for rust on your electrical panel caused by moisture. It can corrode connections, which can lead to overheating and fire.
- Never replace a burnt out fuse with a coin, even for a little while. It could start a fire.
- Tell your children not to fly kites near power lines, and to never climb fences around electrical equipment.
- Never shoot at power line insulators. The electricity could flash to the ground and hurt or kill someone. Also your whole community could be without power until the insulator is repaired.



how to reach us

mail: For newsletter inquiries
 Editor, Remote Communities
 680 Beaverhall Place
 Thunder Bay, ON • P7E 6G9

call: For power outages and emergencies
 24 hours a day, 7 days a week
 1-888-825-8707

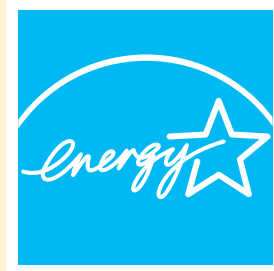
For bill inquiries
 1-800-465-5085



tips to save energy

Spring cleaning

- Gently vacuum the coils on the back or bottom of your fridge.
- Only buy ENERGY STAR® dehumidifiers and keep the container and filters clean.
- If you have a heat recovery ventilator (HRV), clean the filters and don't run it when your windows are open in the spring and summer.
- If you have a window air conditioner, be sure to clean the filters. They can restrict air flow and cost you money.



Save energy at work

- Electricity rates in the workplace are often higher, so turn down air conditioners and turn them off at night.
- Keep office lighting down during the bright summer months. If you have a heat recovery ventilator (HRV), clean the filters and don't run it when your windows are open in the spring and summer.
- Turn on office equipment when you need it and then turn it off. Make sure everything is off when you go home.

Get outside

- In the summer hang your clothes out to dry and save the cost of running your dryer.
- Use your BBQ; it saves energy and doesn't heat up your house.
- Unplug your TV, video games and electronics or shut them off with a power bar. If you don't, they still draw electricity and you have to pay for it.



low-cost cooling tips

Filed: May 26, 2011
EB-2011-0021
Exhibit 102-15
Attachment 3
Page 2 of 2

Air conditioners use a lot of energy; here are ways to keep cool without them.

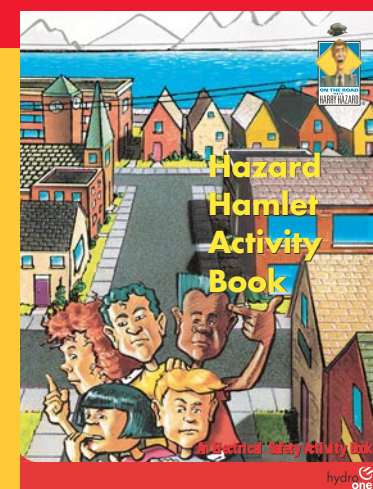
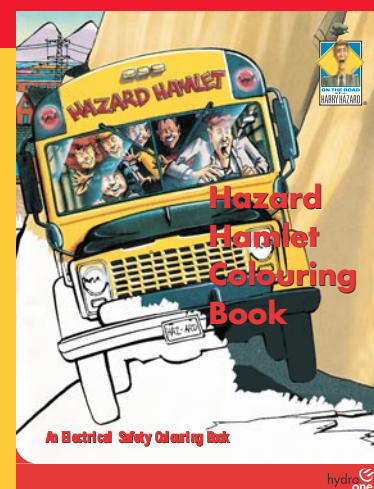


- Put blinds and curtains on windows to keep out the sun.
- Close doors and windows during the heat of the day. Open them when it cools off at night.
- Ceiling fans make you feel cooler. Choose the most energy efficient ones.
- Turn off heaters. Check them all: baseboard, crawlspace heaters and heat trace systems.
- Plant deciduous trees (the kind that lose their leaves in winter). They provide shade in the summer, but let the sun warm you in the winter.

For more tips on safety and energy efficiency visit www.HydroOne.com

Children/Youth Electrical Safety Books

To teach your children about electrical safety, download Hydro One's three safety books: Go to www.hydroone.com/OurCommitment/Safety/Pages/Children'sSafety.aspx and choose the book that fits your child's age group. Teachers, you can order hard copies of these books for your class. Just e-mail Kevin McCormick, Hydro One Corporate Communications at kevin.mccormick@HydroOne.com. Be sure to include the name of the book, the number you need and a delivery address.



1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #16 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to Payment Arrangements: Sections 2.7.1.2 and 2.7.2**

6
7 In its submissions to the OEB for EB-2008-0232 (which proceeding was an application
8 by Remotes for a rate for its two main customer groups. In its submission filed on August
9 29, 2008 (EB-2008-0232, Exhibit C1, Tab 2, Schedule 4, pp. 1 to 4), Remotes wrote in
10 part:

11
12 Standard A (i.e., government) accounts make up approximately 13% of customers (by
13 number) but account for 93% of the outstanding arrears (based on 2007 figures). Prior
14 to 2005, Remotes did not disconnect Standard A accounts in arrears, did not write off
15 outstanding balances and did not have an adequate provision for bad debts related to
16 First Nations Band (Standard A) accounts in arrears, as it was believed that Indian
17 and Northern Affairs Canada (“INAC”) would backstop amounts due from First
18 Nation Band accounts. Following a meeting with Officials from INAC in 2005,
19 Remotes’ understanding of INAC’s position changes, such that it became clear that
20 INAC would no longer backstop amounts from First Nations. As a result of this
21 change in understanding, Remotes increased its provision for bad debts in 2006...The
22 external financial auditor accepted this approach. There are significant challenges and
23 uncertainties related to the collection of Standard A arrears. Remotes has set a target
24 to reduce outstanding Standard A arrears by 15% each year, with some success.
25 Payment plan arrangements and federal government support for these arrangements
26 are being negotiated, but there are limited options available to address these arrears,
27 as arrears relate primarily to essential services such as nursing stations, water and
28 sewage facilities and schools.

29
30 Over the past four years [i.e. from 2003 to 2007], Remotes has been very successful
31 in reducing non-Standard A residential arrears, which make up 7% of the outstanding
32 arrears based on 2007 figures and has worked closely with Band Councils and with
33 residential customers to improve payment of these accounts, but collections are
34 expected to be an ongoing challenge. Most non-Standard A customers do not have
35 bank accounts and are economically disadvantaged. For many of these customers,
36 electricity is the only utility service for which they are billed, making education about
37 the importance of paying bills an ongoing necessity.

38
39 Overall, bad debt expense is expected to be lower in 2008 and 2009 as Remotes
40 expects to negotiate payment arrangements with First Nation Band Councils, and an
41 adequate provision for Standard A accounts has now been established...Direct
42 account write-offs averaged \$0.6 million in the 2005-2007 periods. Remotes recovers
43 accounts that were previously written off when the customer reconnects to the
44 system, or if the customer sets up an account in another community or residence.

1
2 Given this excerpt from Remotes' submission to the OEB in EB-2007-0232, please
3 provide the following information:
4

- 5 a) The figures showing the number of Standard "A" customers and the number of non-
6 Standard "A" (i.e. residential) customers in communities served by Remotes, and the
7 corresponding percentage of the total arrear accounted for by each of these two
8 customer groups, for the years 2008, 2009, and 2010, including the aggregate figures
9 for the total arrears;
10 b) The figures relating to "write-offs" of arrears for the years 2008, 2009, and 2010 for
11 each of the two customer groups; and
12 c) An explanation of the role which "write-offs" of arrears during 2008, 2009, and 2010
13 has played in reducing the overall arrears figures for Remote communities during that
14 period.
15

16 **Response**
17

- 18 a) The DSC exemptions that Remotes is seeking relate only to Residential Customers.
19 The requested information for Residential Customers arrears is provided in EB-2007-
20 0232 Appendix B. Please see below the number of residential customers by year.
21

	2008	2009	2010
Residential Customers in Arrears by Year	2,550	2,689	2,700

- 22
23 b) The chart below shows write-offs of arrears for the requested data for 2009 and 2010.
24 (2008 data is not available)
25

	2009	2010
Residential Bad Debts (Net of Recovery)	16,318.49	32,538.29

- 26
27 c) As shown in chart above, write offs of Residential Bad Debt have not had a material
28 affect on the overall level of arrears.
29

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #17 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to Payment Arrangements: Sections 2.7.1.2 and 2.7.2**

6
7 Given that most of the arrears from Remote communities have been arrears from
8 Standard “A” (i.e. government) customers, why did Remotes not make any distinction in
9 its submission in this proceeding (EB-2011-0021) between arrears from Standard “A”
10 customers and arrears from non-Standard “A” customers (i.e. residents), and provide
11 arrears-related figures and percentages for each of these groups for the years 2008, 2009,
12 and 2010?

13
14 **Response**

15
16 The requested exemptions relate only to Residential Customers, not Standard A
17 customers.
18

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #18 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to Payment Arrangements: Sections 2.7.1.2 and 2.7.2**

6
7 With respect to the arrears program which Remotes advises it has been using since 2007,
8 how does the requirement of a 50% “up front” payment from a Remote customer in
9 arrears, with the remaining 50% owing being paid during the following four (4) months,
10 “meet the intent of the Board’s changes to the DSC”?

11
12 **Response**

13
14 As stated in the pre-filed evidence (EB-2011-0021 p.1 lines 4-6), the amendments to the
15 DSC “are designed to reduce customer disconnections by requiring distributors to offer
16 customers flexible payment options and more time and opportunity to make bill
17 payments.” The amended DSC approach would not meet these goals in Remotes’ service
18 territory.
19

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #19 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to Payment Arrangements: Sections 2.7.1.2 and 2.7.2**

6
7 Does Remotes agree that its own arrears program, which requires a larger “up front”
8 payment from a defaulting customer to avoid disconnection as well as the remaining 50%
9 balance being paid over a shorter period, than that provided by the new DSC rules,
10 imposes a heavier financial burden on Remotes’ customers than is the case for other low-
11 income customers in Ontario?

12
13 **Response**

14
15 No. As stated in its pre-filed evidence, “in Remotes’ experience, its customers do not
16 follow the requirements for payment arrangements during the winter months and are left
17 with balances that are unmanageably large the following year,” (EB-2011-0021 p. 7 lines
18 5-7) and “Remotes has found that its current approach has left few customers
19 disconnected and has enabled customers to manage their accounts...(and) the Social
20 Assistance Office and Band are able to manage requests for support with the smaller
21 balances that result” (EB-2011-0021 p. 7 lines 8-12).

22

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #20 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to Payment Arrangements: Sections 2.7.1.2 and 2.7.2**

6
7 Since 2007, what internal documentation has Remotes circulated within its organization
8 to outline and clarify for its employees the collection practices which its employees
9 should be using. Please provide copies of all relevant (historical and contemporary)
10 documents to show that Remotes own employees have, since 2007, been advised of the
11 details of the collection practices which Remotes has described in its submission to the
12 OEB.

13
14 **Response**

15
16 See Attachment 1.

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #20 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to Payment Arrangements: Sections 2.7.1.2 and 2.7.2**

6
7 Since 2007, what internal documentation has Remotes circulated within its organization
8 to outline and clarify for its employees the collection practices which its employees
9 should be using. Please provide copies of all relevant (historical and contemporary)
10 documents to show that Remotes own employees have, since 2007, been advised of the
11 details of the collection practices which Remotes has described in its submission to the
12 OEB.

13
14 **Response**

15
16 See Attachment 1.

Collection/Disconnection Guidelines

In January each year, Remotes staff meet to schedule 2 trips to every community strictly for collections/disconnections. (April – September)

Letter faxed to FN Chief & Council at that time to notify which 2 months our staff will be in their community for disconnections.

A Collection list is created for customers who are in arrears for each Community. Customers on this list are mailed notification letters of the pending trips well in advance. In this letter, we state that their bills should be paid in full on the Friday before the week of the trip, and we also encourage them to call our office to make payment arrangements if they have large outstanding balance. These letters are sent out early so customer has plenty of time to make arrangements and make a few payments before the trip. This list is continually updated - we check if new customers are now in arrears, and send out letters to them as well. Customers are removed from the list as payments are received.

1 month prior to the trip, a letter is faxed to FN chief & council notifying of the actual week in the month that the trip is scheduled. Also included, is the current collection list and a notice we request to be posted in their Community.

1 week prior to trip, another letter is faxed to FN chief & council notifying them of the pending trip. Updated collection list & notice for posting is sent as well.

Each time the collection list is faxed to the Band, we also fax a copy to the Social Assistance Administrator in each Community. In most cases, they will then issue cheques for their clients if appropriate.

Early Monday, the week of the trip, the collection list is again updated and given to field staff. They use this list for service disconnections. This list is also faxed to the FN Band office. Field staff are now basically in the community for disconnections as we have collected most of the money up front in the office. They will collect money but will not set up payment arrangements.

If customer calls in verification of payment, customer taken off list & crew is notified not to disconnect. Field staff will take list and begin disconnecting the customers. If payment is received by crew or office staff, crew will reco cust. \$65 reco charge is applied.

Collection Process

Issue letters to all customers with **arrears** over \$200.00 (only show balance forward amount on list)

Ensure letter has correct dates for trips for each Community

Update customer list with every payment made and date letter was issued in the comments section

Put a “General Collections” contact on account in CSS (Example: re: ltr o/s balance & disco trip week of “date of trip”)

If customer has PP, ensure remarks are entered on Customer list in “description” field. (Example: PP - \$200/mth beg Jan/07 – OK or Not Kept)

Once entire Community is completed with letters sent out:

update date on customer list

update “Arrears List Updated” spreadsheet in “Collections et al” Folder

update “DisconnectionTripSchedule2007” spreadsheet in “Collections et al” Folder

update “CollectionListSumUpFronttoEnd” spreadsheet in “Collections et al” Folder

make a copy of the list and put in “Monthly Arrears 2007” file cabinet in file folder

“752.52 Collection Correspondence” for appropriate Community

Create new folder in computer under “Communities” for each community titling it

“Disco Trip April 2 2007” as an example – file a cc of the collection list each time you update with the date you did it

Customer Calls in to make Payment Arrangement or to Report Payment

Payments must be substantial so that their current bills and arrears are paid off within 4-6 months

Payment arrangement only to be made if customer calls in with enough lead time so that a couple of payments can be made before trip (not week before trip in other words)

Inform customer if defaults on payment, subject to disconnection during scheduled trip

Inform customer that proof of payment is required on the Friday before the scheduled trip - not during the trip

Full payment required to avoid disconnection – no exceptions

Must remain consistent, tell all customers the same thing (discretion/judgement calls will be discussed before any decision is made to customer)

If disconnected during trip, \$65.00 reco fee is required plus full arrears for reconnection.

Another \$65 disco/reco fee is only applied to customers that are issued “cut out” orders in CSS (once crew has left community)

Collection Trip Completed

- get paperwork from field staff
- count money & balance – go to bank and get money order
- generate remittances as necessary to payment centre – attach to appropriate back up payments
- make cc's of all payments to check for posting to accounts the following week
- issue & complete cut out orders (zero balance radio box to be checked off)
- apply \$65 disco charge manually if d/r during trip
- update “cut out load interruptor” spreadsheet
- update “collection list sum up front to end” spreadsheet
- update “collection trip totals” spreadsheet
- update cust list with cut out info on all customer d/r during trip & those remaining cut out
- update meter lists with notes indicating acct cut out and reading taken when cut out
- file all corresponding paperwork for trip together & file in folder 752.52 collection correspondence for that particular community (top drawer of collection file – titled “monthly arrears 2007”)

Collection/Disconnection Guidelines - 2008

In January each year, Remotes staff meet to schedule 2 trips to every community strictly for collections/disconnections. (April – September)

Letter faxed to FN Chief & Council at that time to notify which 2 months our staff will be in their community for disconnections.

A Collection list is created for customers who are in arrears for each Community. Customers on this list are mailed notification letters of the pending trips well in advance. In this letter, we state that their bills should be paid in full on the Friday before the week of the trip, and we also encourage them to call our office to make payment arrangements if they have large outstanding balance. These letters are sent out early so customer has plenty of time to make arrangements and make a few payments before the trip. This list is continually updated - we check if new customers are now in arrears, and send out letters to them as well. Customers are removed from the list as payments are received.

1 month prior to the trip, a letter is faxed to FN chief & council notifying of the actual week in the month that the trip is scheduled. Also included, is the current collection list and a notice we request to be posted in their Community.

1 week prior to trip, another letter is faxed to FN chief & council notifying them of the pending trip. Updated collection list & notice for posting is sent as well.

Each time the collection list is faxed to the Band, we also fax a copy to the Social Assistance Administrator in each Community. In most cases, they will then issue cheques for their clients if appropriate.

Early Monday, the week of the trip, the collection list is again updated and given to field staff. They use this list for service disconnections. This list is also faxed to the FN Band office. Field staff are now basically in the community for disconnections as we have collected most of the money up front in the office. They will collect money but will not set up payment arrangements.

If customer calls in verification of payment, customer taken off list & crew is notified not to disconnect. Field staff will take list and begin disconnecting the customers. If payment is received by crew or office staff, crew will reco cust. \$65 reco charge is applied.

Collection Process

Issue letters to all customers with **arrears** over \$200.00 (only show balance forward amount on list)

Ensure letter has correct dates and Community name for that particular trip

Update customer list with total payment made per month, and the month letter was issued in the comments section

Put a “General Collections” contact on account in CSS (Example: re: ltr o/s balance & disco trip week of “date of trip”)

If customer has PP, ensure remarks are entered on Customer list in “description” field. (Example: PP - \$200/mth beg Jan/08 – OK or Not Kept)

Once entire Community is completed with letters sent out:

update date on actual “Customer list”

update “Arrears List Updated” spreadsheet in “Collections et al” Folder

update “DisconnectionTripSchedule2008” spreadsheet in “Collections et al” Folder

update “Collection Trip Summary 2008” spreadsheet in “Collections et al” Folder

make a copy of the list and put in “Monthly Arrears 2008” file cabinet in file folder “752.52 Collection Correspondence” for appropriate Community

Create new folder in computer under “Communities” for each community titling it “Disco Trip April 2 2008” as an example – file a cc of the collection list each time you update with the date you did it

Customer Calls in to make Payment Arrangement or to Report Payment

Payments must be substantial so that their current bills and arrears are paid off within 4-6 months

Payment arrangement only to be made if customer calls in with enough lead time so that a couple of payments can be made before trip (not week before trip in other words)

Inform customer if defaults on payment, subject to disconnection during scheduled trip

Inform customer that proof of payment is required on the Friday before the scheduled trip - not during the trip

Full payment required to avoid disconnection – no exceptions

Must remain consistent, tell all customers the same thing (discretion/judgement calls will be discussed before any decision is made to customer)

If disconnected during trip, \$65.00 reco fee is required plus full arrears for reconnection.

Another \$65 disco/reco fee is only applied to customers that are issued “cut out” orders in CSS (once crew has left community)

Collection Trip Completed

- get paperwork from field staff
- count money & balance – go to bank and get money order
- generate remittances as necessary to payment centre – attach to appropriate back up payments
- make cc's of all payments to check for posting to accounts the following week
- issue & complete cut out orders (zero balance radio box to be checked off) – WORK AROUND – issued cut in orders, then void – this will avoid disco orders being generated
- apply \$65 disco charge manually if d/r during trip (if cut out order not issued)
- update “cut out load interruptor” spreadsheet
- update “collection trip summary 2008” spreadsheet
- update cust list with cut out info on all customer d/r during trip & those remaining cut out
- update meter lists with notes indicating acct cut out and reading taken when cut out
- file all corresponding paperwork for trip together & file in folder 752.52 collection correspondence for that particular community (top drawer of collection file – titled “monthly arrears 2008”)

Collection Process

Issue letters to all customers with **arrears** over \$200.00 (only show balance forward amount on list)

Ensure letter has correct dates and Community name for that particular trip

Update customer list with total payment made per month, and the month letter was issued in the comments section

Put a “General Collections” contact on account in CSS (Example: re: ltr o/s balance & disco trip week of “date of trip”)

If customer has PP, ensure remarks are entered on Customer list in “description” field. (Example: PP - \$200/mth beg Jan/09 – OK or Not Kept)

Once entire Community is completed with letters sent out:

update date on actual “Customer list”

update “Arrears List Updated” spreadsheet in “Collections et al” Folder for 2009

update “DisconnectionTripSchedule2009” spreadsheet in “Collections et al” Folder

update “Collection Trip Summary 2009” spreadsheet in “Collections et al” Folder

make a copy of the list and put in “Monthly Arrears 2009” file cabinet in file folder “752.52 Collection Correspondence” for appropriate Community

Create new folder in computer under “Communities” for each community titling it “Disco Trip April 2 2009” as an example – file a cc of the collection list each time you update with the date you did it

Update new spreadsheet “Reconnects2009” found in “Collections et al” folder when a reconnect has happened outside of the actual trip when staff are in Community

Customer Calls in to make Payment Arrangement or to Report Payment

Payments must be substantial so that their current bills and arrears are paid off within 4-6 months

Payment arrangement only to be made if customer calls in with enough lead time so that a couple of payments can be made before trip (not week before trip in other words)

Inform customer if defaults on payment, subject to disconnection during scheduled trip

Inform customer that proof of payment is required on the Friday before the scheduled trip - not during the trip

Full payment required to avoid disconnection – no exceptions

Must remain consistent, tell all customers the same thing (discretion/judgement calls will be discussed before any decision is made to customer)

If disconnected during trip, \$65.00 reco fee is required plus full arrears for reconnection.

Another \$65 disco/reco fee is only applied to customers that are issued “cut out” orders in CSS (once crew has left community)

Collection Trip Completed

- get paperwork from field staff
- count money & balance – go to bank and get money order
- generate remittances as necessary to payment centre – attach to appropriate back up payments
- make cc's of all payments to check for posting to accounts the following week
- issue & complete cut out orders (zero balance radio box to be checked off) – WORK AROUND – issued cut in orders, then void – this will avoid disco orders being generated
- apply \$65 disco charge manually if d/r during trip (if cut out order not issued)
- update “cut out load interruptor” spreadsheet
- update “collection trip summary 2009” spreadsheet
- update cust list with cut out info on all customer d/r during trip & those remaining cut out
- update meter lists with notes indicating acct cut out and reading taken when cut out
- file all corresponding paperwork for trip together & file in folder 752.52 collection correspondence for that particular community (top drawer of collection file – titled “monthly arrears 2009”)

If any accounts get reconnected at a later date once they pay, the spreadsheet “reconnects 2009) needs to be updated

Collection/Disconnection Guidelines - 2009

In January each year, Remotes staff schedule 2 trips to every community strictly for collections/disconnections. (April – September)

Letter faxed to FN Chief & Council at that time to notify which 2 months our staff will be in their community for disconnections.

A Collection list is created for customers who are in arrears for each Community. Customers on this list are mailed notification letters of the pending trips well in advance. In this letter, we state that their bills should be paid in full on the Friday before the week of the trip, and we also encourage them to call our office to make payment arrangements if they have large outstanding balance. These letters are sent out early so customer has plenty of time to make arrangements and make a few payments before the trip. This list is continually updated - we check if new customers are now in arrears, and send out letters to them as well. Customers are removed from the list as payments are received.

1 month prior to the trip, a letter is faxed to FN chief & council notifying of the actual week in the month that the trip is scheduled. Also included, is the current collection list and a notice we request to be posted in their Community where the majority of customers will see it. (ie: northern store, post office, band office etc.)

1 week prior to trip, another letter is faxed to FN chief & council notifying them of the pending trip. Updated collection list & notice for posting is sent as well.

Each time the collection list is faxed to the Band, we also fax a copy to the Social Assistance Administrator in each Community. In most cases, they will then issue cheques for their clients if appropriate.

Day of the trip, the collection list is again updated and given to field staff to use for service disconnections. This same list is also faxed to the FN Band office. Field staff are now basically in the community for disconnections as we have collected most of the money up front in the office. They will accept cash, cheque, money orders directly from the customer (to avoid disconnection) but will not set up payment arrangements. Crew can direct customer with credit card payments to call the office.

If customer calls in verification of payment to office, customer taken off list & crew is notified not to disconnect.

Crew will reconnect any customer if disconnection has already taken place, once verification of payment made. A \$65 reconnection charge is applied.

Collection/Disconnection Guidelines - 2010

In January each year, Remotes staff meet to schedule 2 trips to every community strictly for collections/disconnections. (April – September)

Letter faxed to FN Chief & Council at that time to notify which 2 months our staff will be in their community for disconnections.

A Collection list is created for customers who are in arrears for each Community. Customers on this list are mailed notification letters of the pending trips well in advance. In this letter, we state that their bills should be paid in full on the Friday before the week of the trip, and we also encourage them to call our office to make payment arrangements if they have large outstanding balance. These letters are sent out early so customer has plenty of time to make arrangements and make a few payments before the trip. This list is continually updated - we check if new customers are now in arrears, and send out letters to them as well. Customers are removed from the list as payments are received.

1 month prior to the trip, a letter is faxed to FN chief & council notifying of the actual week in the month that the trip is scheduled. Also included, is the current collection list and a notice we request to be posted in their Community.

1 week prior to trip, another letter is faxed to FN chief & council notifying them of the pending trip. Updated collection list & notice for posting is sent as well.

Each time the collection list is faxed to the Band, we also fax a copy to the Social Assistance Administrator in each Community. In most cases, they will then issue cheques for their clients if appropriate.

Early Monday, the week of the trip, the collection list is again updated and given to field staff. They use this list for service disconnections. This list is also faxed to the FN Band office. Field staff are now basically in the community for disconnections as we have collected most of the money up front in the office. They will collect money but will not set up payment arrangements.

If customer calls in verification of payment, customer taken off list & crew is notified not to disconnect. Field staff will take list and begin disconnecting the customers. If payment is received by crew or office staff, crew will reco cust. \$65 reco charge is applied.

Collection/Disconnection Guidelines 2010-2011

In January each year, Remotes staff meet to schedule 2 trips (spring/fall) to every community strictly for disconnections. (April – October)

Letter faxed in January to FN Chief & Council to notify which 2 months our staff will be in their community for disconnections.

A disconnection list (xcel spreadsheet) is created for customers who are in arrears for each Community using the balance forward found in CSS. Customers on this list are mailed DNL letters of the pending trip well in advance. In this letter, we state that their bills should be paid in full on the Friday before the week of the trip, and we also encourage them to call our office to make payment arrangements if they have a large outstanding balance. Payment plans made up entered in our spreadsheet so at the disconnection time, if they have defaulted, they remain on the list. These letters are sent out early so customer has plenty of time to make arrangements and make a few payments before the trip. This list is continually updated - we check if new customers are now in arrears, and send out letters to them as well. Customers are removed from the list as payments are received.

1 month prior to the trip, another letter & list is faxed to FN chief & council notifying of the actual week in the month that the trip is scheduled. Also included, is a disconnection Poster we request to be posted in their Community in a place where customers would see it (Band Office, Northern Store etc.) and/or announced on their local radio station.

1 week prior to trip, another letter is faxed to FN chief & council notifying them of the pending trip. Updated collection list & disconnection poster for posting is sent again.

Each time the collection list is faxed to the Band, we also fax a copy to the Social Assistance Administrator in each Community. In most cases, they will then issue cheques for their clients and we in turn remove them from the disconnection list.

The day of the trip, the final collection list is faxed to the FN band office and same list given to the field staff for disconnections. As a courtesy, field staff report to the Band office when they arrive in the Community to notify they will be starting to disconnect customers. They are now basically in the community for disconnections as we have collected most of the money up front in the office. They will begin disconnections, but will take payment should a customer give them money or some other sort of payment. If customer calls in verification of payment to our office, we take them off the list & crew in field is notified to not disconnect. If customer already disconnected, we charge \$65.00 & crew will reconnect right away. If crew has left the Community, the reconnection will be scheduled and bundled with other work in the Community as soon as possible. Anytime if there is a crew who has scheduled work in a community close by, they could touch down and perform the reconnects, then fly out and continue with their own work.

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #21 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to the Opening and Closing of Accounts: Sections**
6 **2.8.1, 2.8.2, 6.1.2.1 and 6.1.2.2**

7
8 In its submission to the OEB, Remotes states that it “does not transfer arrears from one
9 customer to another customer, or from a residential customer to the Band Council.” Is
10 Remotes aware of any practice on the part of its employees in which new customers
11 moving into a residence, or a building where Standard “A” rates apply, have been told
12 that they will not be able to (a) open an account and/or (b) have electricity service
13 reconnected to the premises unless and until they pay the outstanding arrears of a
14 previous occupant of the premises? Can Remotes provide assurances to the Board that
15 this has not been done in the past?

16
17 **Response**

18
19 Remotes does not require new customers to pay outstanding arrears for other customers.
20 However, if a customer has moved without informing Remotes, Remotes will not set up a
21 new service account at that location for a new customer until the move is confirmed by
22 the previous customer or by the Band Council in writing.
23

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #22 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to the Opening and Closing of Accounts: Sections**
6 **2.8.1, 2.8.2, 6.1.2.1 and 6.1.2.2**

7
8 Remotes advises that “Residents can move with as little as 24 hours’ notice. Residents
9 tend to move frequently, when better homes are available or to move closer to extended
10 family within the communities.” Please provide any statistics or other information which
11 Remotes has collected to support these statements.

12
13 **Response**

14
15 Remotes staff estimate that they perform between 20-50 move-in, move-out procedures
16 each month.

17

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #24 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to the Opening and Closing of Accounts: Sections**
6 **2.8.1, 2.8.2, 6.1.2.1 and 6.1.2.2**

7
8 Has Remotes ever demanded additional payments (e.g. reconnection fees) from new
9 customers in order to re-install a meter which has been removed from a residence or to
10 physically reconnect a line to a residence (where such equipment has been disconnected
11 previously by Remotes) as a condition to opening an account for the new customer? If so,
12 please provide particulars relating to such fees (e.g. amounts demanded by Remotes,
13 amounts actually paid by new customers, etc.).

14
15 **Response**

16
17 Customers who are disconnected and who reconnect within six months are charged \$65.
18 When a service has been disconnected for longer than six months, the reconnection is
19 treated as a new connection. Normally, individual customers do not pay the cost for new
20 connections but receive financial support from the Band Council. Customers are required
21 to have an Electrical Safety Authority inspection prior to the reconnection and the
22 following charges, including flights, apply:

23

Type of Service	Fixed Price Fee
Meter Installation Only	\$ 425 per service
Connection at Pole <i>or</i> Mast	\$ 850 per service
Connection at Mast <i>and</i> Pole	\$1,600 per service

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #25 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to the Opening and Closing of Accounts: Sections**
6 **2.8.1, 2.8.2, 6.1.2.1 and 6.1.2.2**

7
8 Is Remotes aware of damage caused to any residences or other buildings in the
9 communities it serves because of the physical disconnection of electrical lines to such
10 premises after a customer has fallen into arrears and service has been terminated? If so,
11 please provide particulars.

12
13 **Response**

14
15 Remotes is not aware of any specific cases of damage related to service disconnection.
16 Remotes is aware, however, that Electrical Safety Authority inspections are required after
17 a service has been disconnected for six months in case the electrical system in the house
18 has deteriorated.

19

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #26 List 1**
2

3 *Interrogatory*
4

5 **Reference: Inquiries relating to the proposed exemptions for Remotes and their**
6 **impact on LEAP**
7

8 Has Remotes considered whether its collection practices--- especially its arrears program
9 requiring a 50 per cent “up front” payment with only four (4) months to pay the
10 remaining 50% of arrears --- would result in the same eligibility of its customers under
11 LEAP as compared to other low-income customers in the province? If so, please provide
12 copies of any reports or documents relating to same.
13

14 *Response*
15

16 Remotes’ current payment arrangement requirements will not affect its customers’
17 eligibility for LEAP funding. LEAP eligibility is based on annual income as well as
18 other prescribed criteria. However, as indicated in Appendix C of EB-2011-0021 pre-
19 filed evidence and discussed on Page 6 lines 23-28, the long payment arrangements
20 would result in large balances that are beyond the available support in the community and
21 are also beyond the maximum support available through the LEAP program.
22
23

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #27 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to the proposed exemptions for Remotes and their**
6 **impact on LEAP**

7
8 Can Remotes provide assurances to NAN that its proposed arrears program (which would
9 entail exemptions from sections 2.7.1.2 and 2.7.2) would result in the same benefits and
10 treatment of its customers under LEAP as compared to other low income customers in the
11 province, given the new rules under the DSC and the eligibility criteria of LEAP?

12
13 **Response**

14
15 Remotes collection process effectively balances the requirement to collect outstanding
16 amounts owing with recognition of the inaccessibility of the service territory, the difficult
17 circumstances many of its customers face and the need for flexibility in bill payment.
18 The implementation of standard collection practices will result in increased program
19 costs (resulting in higher rates for its customers), more service disconnections and less
20 flexibility for its customers.

21
22
23

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #28 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to the proposed exemptions for Remotes and their**
6 **impact on LEAP**

7
8 Is Remotes contemplating criteria for LEAP, including eligibility requirements, which are
9 different from those articulated by the OEB?

10
11 **Response**

12
13 No.
14

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #29 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to the proposed exemptions for Remotes and their**
6 **impact on LEAP**

7
8 Has Remotes chosen a social agency to administer the LEAP? If so, please identify that
9 agency for each of the communities served by Remotes.

10
11 **Response**

12
13 Remotes has contracted with the Ontario Native Welfare Administrators' Association
14 (ONWAA) as its lead agency to administer the LEAP program. ONWAA has informed
15 Remotes that it will work with the Thunder Bay United Way to offer LEAP services in
16 the non First Nation communities in Remotes' service territory.

17
18
19
20

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #30 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to the proposed exemptions for Remotes and their**
6 **impact on LEAP**

7
8 Has Remotes advised social agencies which it has designated of the collection practices
9 which Remotes has apparently been using since 2007, as described by Remotes in its
10 submission to the OEB? If so, please provide copies of any written material provided to
11 such social agencies by Remotes.

12
13 **Response**

14
15 Remotes met with ONWAA and explained its approach to collections. In order to
16 describe its process more clearly to ONWAA, Remotes shared a copy of the evidence
17 filed in this proceeding, the collection process overview, Exhibit I, Tab 2, Schedule 20,
18 and a copy of the collections schedule for 2011.

19
20
21

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #31 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to the proposed exemptions for Remotes and their**
6 **impact on LEAP**

7
8 Given the economically disadvantaged nature of Remotes' customers, and given that the
9 funding for LEAP is derived from Remotes' own customer base, does Remotes agree that
10 LEAP will, at least in part, involve a redistribution of funds from one economically
11 disadvantaged group of customers (e.g. residents who have managed to pay their
12 electricity bills) to another economically disadvantaged group of customers (e.g. residents
13 who have not managed to pay their bills)?

14
15 **Response**

16
17 Remotes recognizes that most of its customers are economically disadvantaged. To the
18 extent that LEAP funding is included in customer rates, the program will, in part, involve
19 a redistribution of funds from one economically disadvantaged group of customers to
20 another economically disadvantaged group of customers.
21
22

1 **NISHNAWBE ASKI NATION (NAN) INTERROGATORY #32 List 1**

2
3 **Interrogatory**

4
5 **Reference: Inquiries relating to the proposed exemptions for Remotes and their**
6 **impact on LEAP**

7
8 Has Remotes ever requested the OEB or the Ontario Government to provide funding for
9 LEAP from a source other than the customers in the communities which Remotes serves?
10 If so, please provide particulars, including any relevant documents.

11
12 **Response**

13
14 No.