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July 22, 2011

VIA RESS, E-MAIL & COURIER

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

Dear Ms. Walli:

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

By email and web posting the Ontario Energy Board issued a letter dated June 29, 2011 regarding low-income related customer service standards and requested gas distributors to provide information and respond to two sets of questions, Attachment A to the letter.

As per the Board's request, attached please find Enbridge's responses and submission. Enbridge's submission is being filed through the Board's Regulatory Electronic Submission System.

Please contact the undersigned if you have any questions.

Yours truly,

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

Bonnie Jean Adams
Regulatory Coordinator

Attachment

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

EB-2010-0280
Low-Income Related Customer Service Standards

SUBMISSIONS OF
ENBRIDGE GAS DISTRIBUTION INC.

July 22, 2011

**SUBMISSIONS OF ENBRIDGE GAS DISTRIBUTION INC. (“ENBRIDGE”)
IN RESPONSE TO OEB LETTER RE. LOW-INCOME RELATED CUSTOMER
SERVICE STANDARDS**

1. In its June 29, 2011 letter, the Ontario Energy Board (the “OEB” or the “Board”) sought stakeholder input in respect of possible low-income related customer service standards for rate-regulated gas distributors. As the first step in this process, the Board has invited gas utilities to provide information about their current customer service practices and policies for low-income customers, and about how they compare with the final low-income customer service rules for electricity distributors which come into force on October 1, 2011 (the “Electricity Low-Income Customer Service Rules”). The Board has also asked gas distributors to suggest any new or modified policies that are appropriate. Finally, the Board asked two specific questions about whether it is appropriate to issue prescriptive customer service rules for low-income customers that would apply to all gas distributors.

A. OVERVIEW

2. As set out in detail below, Enbridge submits that no specific or additional regulation or prescription of its customer service policies for low-income customers is necessary. The approach endorsed by the OEB in its June 29, 2011 Notice of Proposal to Amend the Gas Distribution Access Rule (“GDAR”) which requires gas distributors to publish and adhere to customer service policies for all customers that address a variety of subject areas is sufficient to ensure that all gas distributor customers are treated fairly and appropriately.
3. Enbridge’s current customer service policies and practices function effectively in the interest of customers and the Company. Enbridge’s current customer service policies provide protection and certainty for customers while allowing Enbridge to maintain appropriate flexibility to account for operational and financial considerations. The responsiveness and effectiveness of Enbridge’s customer service policies will be enhanced when the “refinements” to Enbridge’s customer service policies that were endorsed by the Board in its June 29th Notice are adopted. In the result, the customer service needs of all of Enbridge’s customers have been and will continue to be met in a responsive manner.

4. Enbridge does not distinguish between customers based on income level when addressing arrears management issues. The Company does not support creating and implementing different customer service policies and practices for low-income customers. Enbridge's current and pending customer service practices and policies are sufficiently broad to allow the Company to accommodate customers facing payment difficulties, including low-income customers. As explained in its February 17, 2011 submissions, Enbridge's customer service practices and policies are premised on flexibility, to allow changes to be made over time, and to allow different approaches for different customers. As set out in Attachment "A" to these submissions, Enbridge's interpretation and application of its practices and policies allows for appropriate approaches to meet the needs and circumstances of customers facing payment difficulties, including low-income customers. For example, with the implementation of the customer service refinements, Enbridge will permit even customers in arrears to join its Budget Billing Plan and Enbridge works closely with customers to avoid disconnections and will suspend disconnection actions for a period of 21 days for customers who are seeking assistance from LEAP, social agencies and third parties.
5. It is significant to note that the Company's dealings with low-income customers do not appear to be a significant topic of complaint or concern by customers or the Board. As explained in previous submissions, over the past three years there have been fewer than 50 customer service complaints per year (on average) by Enbridge customers to the OEB. That is an extremely low number when considered in the context of Enbridge providing service and monthly bills to more than 1.9 million customers (i.e. ~23 million bills per year). Of course, many or most of these complaints will not have involved low-income customer issues. Given the lack of expressed concerns, Enbridge submits that there is no need here to align the policies of electricity and gas distributors for low-income customers.
6. Enbridge is concerned that the Board's adoption of a more prescriptive approach that would specify and mandate particular rules for low-income customers, as set out in the Electricity Low-Income Customer Service Rules, would not only add costs and reduce flexibility, but might also lead to further unintended consequences. While these, by their very nature, cannot be accurately foreseen, the point is that Enbridge's current practices have been tried and tested over time and, as a result, have evolved and developed in a

way that takes account of and ameliorates any impacts. Enbridge believes that the introduction of prescriptive rules will not allow the same leeway to accommodate unintended consequences.

7. As noted in other submissions, Enbridge remains concerned that the overall impact of prescriptive new customer service rules, whether for all customers or for a sub-group of customers, will be to increase operating, bad debt and working capital costs. The costs arising from specific customer service rules for low-income customers would be recoverable from all ratepayers (or all residential class ratepayers). Of course, this raises concerns around cross-subsidization between ratepayers. Enbridge therefore urges the Board to specifically consider these additional costs, and address why it is appropriate for all ratepayers (the majority of whom would not benefit from new customer service rules for low-income customers) to bear the costs.
8. In summary and in response to the Board's two questions, Enbridge submits that:
 - (a) Its current customer service policies and practices, along with the pending "refinements" to those policies, ensure appropriate levels of service for low-income customers (and are reasonably consistent with Union Gas); and
 - (b) Accordingly, there is no need for additional rules (in the form of changes to GDAR or otherwise) to prescribe the customer service policies applicable to its low-income customers, or to require that separate low-income customer service polices be developed and implemented.

B. ENBRIDGE'S CURRENT APPROACH

9. The Board's June 29, 2011 letter asks gas distributors to provide information (in chart form) about their current customer service practices and policies for low-income customers, and to compare those approaches to the Electricity Low-Income Customer Service Rules. Enbridge's response is set out at Attachment "A" to these submissions. As seen in Attachment "A" to these submissions, in most areas Enbridge's practices and policies are consistent with the intent of the Electricity Low-Income Customer Service Rules. Where there are divergences between Enbridge's approach and the Electricity Low-Income Customer Service Rules, there are good reasons for such differences.

10. For many years, Enbridge has been aware of and responsive to the particular circumstances faced by low-income customers. For example, without any OEB directive Enbridge has already been a leader in identifying and addressing issues faced by low-income customers. Enbridge and the United Way created the Winter Warmth Fund in 2004 to provide emergency assistance to low-income customers. The Winter Warmth Fund has continued, expanded and grown since that time. The approach used for the Winter Warmth Fund has now been adopted, in large part, by the Board as the Low Income Energy Assistance Plan (LEAP) initiative, which provides financial assistance to qualifying customers on a year-round basis.

11. As seen in the chart at Attachment “A”, and in the following sub-paragraphs, Enbridge’s current customer service practices and policies address the issues faced by low-income customers and other customers facing payment difficulties in many ways. For example:
 - (a) Enbridge’s approach to disconnections ensures that customers in arrears are not disconnected during the winter heating season. Beyond this, though, before the start of the heating season, Enbridge visits each customer who is then disconnected, to educate customers about payment options available, including the Winter Warmth Fund. This visit is followed up with a letter and two phone calls, urging the customer to investigate payment options to allow reconnection to proceed.

 - (b) Enbridge offers (and encourages) all customers the option to participate in a Budget Billing Plan, which is a program that helps spread annual gas costs evenly throughout the year. The Board has recognized the importance of this type of approach to assist low-income customers in managing their energy costs throughout the year. As part of the “refinements” to be implemented to its customer service policies, Enbridge will allow customers in arrears who have entered into payment arrangements to enrol in the Budget Billing Plan. This will assist all customers (including low-income customers) experiencing payment difficulties to manage their future costs.

 - (c) Enbridge has developed a flexible approach to arrears management. Enbridge offers all customers in arrears the opportunity to discuss and establish a payment

arrangement in order to avoid disconnection and clear up arrears, based on that customer's needs. Enbridge's approach is less rigid than what is set out in the Electricity Low-Income Customer Service Rules. In some cases Enbridge's customers will establish multiple payment arrangements in a 12 month period. In addition, Enbridge's customers are generally not asking for 5 and 10 month (or longer) payment arrangements – indeed, in some cases a long payment arrangement term is not to the customer's benefit as it sets an artificial budget and can lead to the customer further over-extending themselves. Enbridge believes that its flexibility to continue a variety of payment arrangement approaches (which is very effective and was used in over 150,000 instances over the past year) will be reduced if the Electricity Low-Income Customer Service Rules are implemented for gas utilities. In contrast to the Electricity Low-Income Customer Service Rules, Enbridge does not propose to waive service and late payment fees for low-income customers who enter into payment arrangements. The Company believes that it is appropriate for all customers whose actions result in the Company incurring costs related to collections, disconnection and non-payment, be accountable for the payment of those charges. Most of these costs could be avoided by prompt action on the part of the customer, for example, calling the Company at the time they know that payment will be difficult. This would avoid additional collections and potentially disconnection costs from being incurred. The Company believes that the posting of Customer Service Policies on its website will encourage customers to call and notify the Company of payment issues.

- (d) Enbridge's disconnection policy ensures multiple contacts with customers before any actual disconnection. Through those contacts, which are by phone, bill message or separate notice, Enbridge ensures that customers are provided with information about the arrears amount and payment options. As part of the pending changes to its policies, Enbridge will ensure that when it is notified by a registered charity, government agency, social service agency or third party that an assessment or arrangement for payment is in process, then disconnection actions will be suspended for 21 days. Further, and also as part of the pending changes to its policies, Enbridge will take into account the amount of any security

deposit being held before issuing a Disconnection Notice. In other words, no Disconnection Notice would be issued if the amount of arrears is less than or equal to the amount of the security deposit.

- (e) As part of the refinements to its customer service policies, Enbridge will be reviewing customer security deposits after one year, to determine whether some or all amounts should be credited/refunded to the customer. This will benefit all customers, including low-income customers. All customers also benefit from Enbridge's current policy of waiving security deposits in a variety of circumstances, including when they provide a letter of reference from another utility, or enroll in Enbridge's Pre-Authorized payment plan, or have had a previous residential account with good payment history. In contrast to the Electricity Low-Income Customer Service Rules, Enbridge does not propose to waive security deposits for low-income customers, although Enbridge's refined policy will be to allow security deposits to be paid over a number of months. The purpose of a security deposit is to ensure that monthly bills are paid on time and to cover any outstanding arrears at the time the customer ceases to be a residential gas service customer. If the Company were to not charge security deposits for any reason, the risk to bad debt would be borne by all customers. Security deposits are charged to protect and minimize impacts to rates for all customers.
- (f) Finally, Enbridge proposes to make two additional modest changes to its customer service practices and policies for all customers, with the intent that such changes may be of particular benefit to low-income customers. First, Enbridge will add information about the LEAP program to Disconnection Notices. Second, Enbridge will enhance the messaging provided to its customers through the various stages in the disconnection process (from the initial notice of arrears up to the actual disconnection work order) to ensure that the customer is made aware of the ability to make a payment arrangement. Enbridge will also enhance its messaging to ensure that customers are made aware of possible assistance from LEAP and/or social service agencies. These changes would be made along with the other "refinements" to Enbridge's policies being implemented in response to the Board's June 29th Notice.

12. As explained in Enbridge's February 17th submissions, and as seen above and in Attachment "A" to these submissions, the Company's customer service practices and policies are appropriate and responsive, and create flexibility to allow Enbridge to create solutions that are considerate of particular customers' circumstances. That means that Enbridge can be and is mindful of the circumstances faced by low-income customers and other customers facing payment difficulties when working with those customers.
13. Accordingly, there is no need for a prescriptive approach to specify customer service policies that Enbridge must adopt for its low-income customers. A prescriptive approach could take away from the flexibility currently available, and would likely add costs to be borne by all ratepayers. Moreover, such an approach would require Enbridge to identify and track which of its customers should be classified as "low-income", which could be a new requirement that would be expensive and difficult to assess, monitor, update and enforce.
14. Enbridge notes that while the process established by the Board's June 29th letter anticipates that stakeholders will provide comments on the gas distributors' submissions, no allowance has been made for responses by gas distributors to the stakeholder submissions. Enbridge requests that it be provided an opportunity to respond to issues and proposals advanced by stakeholders.
15. In addition, should the Board conclude, notwithstanding Enbridge's comments, that further low-income customer service practices and policies may be appropriate, then Enbridge urges the Board create a process to examine current experience before making any determination about what new rules are needed. To be able to best understand how Enbridge's current approaches are working, it may be appropriate to convene a stakeholder conference with all interested parties, as well as Board members and OEB Staff, so that all perspectives can be presented and exchanged.
16. Finally, Enbridge notes that there will be costs associated with any additional customer service policies that are prescribed or mandated for low-income customers. These costs are appropriately recovered from ratepayers, and Enbridge would expect to record such costs in an appropriate deferral or variance account for later disposition.

C. RESPONSE TO BOARD'S QUESTIONS

17. The Board's June 29th letter asked stakeholders to answer two questions.
- (a) *Are current low-income customer service standards, along with the proposed modifications and enhancements, sufficient to ensure reasonable consistency across the province and appropriate levels of service for low-income customers such that a less prescriptive approach to Board oversight is warranted?*
 - (b) *If so, should the Board adopt the same approach as that proposed for customer service standards in general (i.e., require each rate-regulated gas distributor to develop, publish, and adhere to low-income related customer service standards for certain prescribed areas of customer service, including a complaint process with recourse to the Board)?*
18. Enbridge's customer service policies and practices provide protection and certainty for all customers while allowing Enbridge to maintain appropriate flexibility to account for operational and financial considerations. As set out in Attachment "A", Enbridge's policies (with the "refinements" to be implemented in response to the Board's June 29th Notice) provide for appropriate levels of service to all of Enbridge's customers, including low-income customers. These policies are consistent for all of Enbridge's customers, and are reasonably similar to the corresponding policies of Union Gas (as can be seen from Union's February 17, 2011 submissions), meaning that virtually all gas consumers in Ontario benefit from relatively uniform policies and practices.
19. In the result, and in response to the Board's first question, there is no need for a prescriptive approach to specify customer service policies that Enbridge must adopt for its low-income customers.
20. Indeed, and in response to the Board's second question, no additional Board oversight of Enbridge's customer service policies and practices is warranted. Enbridge's updated and refined customer service practices and policies will ensure that Enbridge's low-income customers have the benefit of fair and flexible customer service policies which continue to allow Enbridge to appropriately address the issues faced by low-income customers and other customers facing payment difficulties. As noted by the Board in its June 29th Notice, the new section 8 of the GDAR ensures that Enbridge's customer service practices and policies will be transparent and enforceable by the OEB. All customers will also have access to a dispute resolution process which includes recourse

to the OEB where necessary. Accordingly, there is no need for any further requirement for Enbridge to create and/or maintain discrete low-income customer service policies and practices.

Attachment A:

Proposed Customer Service Policies and Practices for Eligible Low-Income Natural Gas Customers

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

Date: July 22, 2011

- 1. Definition of Eligible Low-Income Customer:** A definition of eligible low-income customers is required in order to implement low-income customer service standards and rules.

New Low-Income Code Provisions for Electricity Distributors¹	Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers
<p>Eligible low-income customers are residential electricity customers who have a pre-tax household income at or below Statistics Canada's most recent pre-tax Low Income Cut-Off plus 15%, taking into account family and community size and are qualified by a Social Service or Government Agency.</p> <p>Customers must be qualified by a Social Service or Government Agency that:</p> <ul style="list-style-type: none"> i) partners with their local electricity distributor to assess eligibility for Emergency Financial Assistance; or ii) assesses eligibility for other energy financial assistance or for other low-income financial assistance programs, and partners with their local distributor to qualify customers for eligibility. <p>If customers have qualified for Emergency Financial</p>	<p><i>Enbridge's current policies and practices meet the intent of this rule. The Company is proposing no additional changes to policies and practices for low-income customers and we believe that the Customer Service Policies and modifications already agreed to will be sufficient to protect all customers. For LEAP Emergency Financial Assistance Program purposes, this eligibility guideline for determination of low income is used.</i></p> <p><i>In the Company's daily correspondence with its customers, it does not currently track or request information to assess a customer's eligibility for low income status. Enbridge's current policies and practices are to work with our customers based on individual circumstances and determine appropriate actions. We will direct customers having financial difficulties to agencies responsible for providing Winter Warmth and Leap funding. The Company's practice is to negotiate and work with</i></p>

¹ The Board has approved and issued customer service rules for eligible low-income electricity customers. They will come into effect October 1, 2011. These will supplement the customer service rules applicable to all residential customers which were released on July 2, 2010.

Assistance under the Low-income Energy Assistance Program (LEAP), they will automatically qualify for all of the low-income customer service rules under the codes.

After qualifying as an eligible low-income electricity customer, their low-income status will remain in effect for purposes of the codes for 2 years from the date they qualified.

Eligible low-income customers must contact their distributor before a special low-income customer code rule will be made available to them.

customers based on their individual situation and determine an appropriate payment arrangement, or payment extension as needed.

2. Security Deposits: Existing security deposits must be returned if requested by an eligible low-income customer after paying any arrears. Eligible low-income customers may request a waiver if their distributor requests a new security deposit.

<p>New Low-Income Code Provisions for Electricity Distributors</p>	<p>Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers</p>
<p>If an eligible low-income consumer has previously paid their distributor a security deposit, they may ask for it to be returned, after paying any outstanding arrears. Distributors shall advise all residential customers of this right annually. Any remaining security deposit returned to the customer will be credited to their account if the amount due is less than their average monthly bill. If the amount is equal to or greater than their average monthly bill, they could request a refund by cheque.</p> <p>An eligible low-income customer may request a waiver if their distributor requests a new security deposit. Distributors are to advise customers of this right when issuing a bill for a security deposit.</p>	<p><i>Enbridge's current policies and practices are different from this rule. The Company is proposing no additional changes to policies and practices for low income customers and we believe that the Customer Service Policies and modifications already agreed to will be sufficient to protect all customers.</i></p> <p><i>The purpose of a security deposit is to ensure that monthly bills are paid on time and to cover any outstanding arrears at the time the customer ceases to be a residential gas service customer. If the Company were to forego its right to charge security deposits for any reason, the risk to bad debt would be borne by all customers and security deposits are charged to protect and minimize impacts to rates for all customers.</i></p> <p><i>Security deposits may be required of new customers or customers who have had their gas service disconnected for non-payment. Security deposits are billed on the first monthly invoice and are due by the Late Payment Effective Date. Enbridge will work with the customers based on individual circumstances and has already agreed to a business process change in its Customer Service Policies to allow for a payment arrangement for the payment of a security deposit over a period of up to six months in the case of a new customer.</i></p> <p><i>Enbridge also already offers a number of ways to have security deposits waived:</i></p> <ul style="list-style-type: none"> <i>(1) the Customer provides a letter of reference;</i> <i>(2) the Customer enrolls in Enbridge's Pre-Authorized payment plan; or</i> <i>(3) the Customer has a previous residential account with good payment history.</i>

	<p><i>In addition, Enbridge has already agreed to amend its Customer Service Policies to have its CIS review customers' security deposits after 12 months from the month it is fully paid to determine if the deposit should be refunded, rather than 24 months as it is today. Such a change will result in customers having their security refunded for good payment history sooner than in the past.</i></p>
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3. Correction of Billing Errors: Eligible low-income customers may pay under-billing adjustments over an extended period of time depending on the under-billed amount.

New Low-Income Code Provisions for Electricity Distributors	Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers
<p>When a billing error has occurred and an eligible low-income customer owes their electricity distributor for an underpayment, they may elect to pay over:</p> <ul style="list-style-type: none"> i) a period equal to the duration of the billing error (up to a maximum of 2 years); or ii) a period of 10 months where the under-billed amount is less than twice the customer's average monthly bill and over a period of 20 months where the under-billed amount equals or exceeds twice the customer's average monthly bill. <p>Distributors shall advise customers of these options.</p>	<p><i>Enbridge's current policies and practices meet the intent of this rule. The Company is proposing no additional changes to policies and practices for low income customers and we believe that the Customer Service Policies and modifications already agreed to will be sufficient to protect all customers. If a customer is under-billed for any reason, the charge is applied to the account. If the customer chooses to pay the under-billed amount in installments, Enbridge will work with the customer to determine a suitable payment arrangement based on that customer's circumstances. Enbridge will allow for a payment arrangement of up to the amount of time the customer was under-billed.</i></p> <p><i>In addition, Enbridge has already agreed to amend its policies for processing over or under-billing adjustments. Billing Adjustments will only be permitted over a period of up to two years for residential customers, except in the case of theft or illegal acts of a customer, in which case Enbridge will bill as far back as the information available will allow. Such a change will result in a limit to the amounts that can be back-billed.</i></p>

4. Equal Payment and Equal Billing Plans: Distributors must offer to eligible low-income customers equal billing plans that do not require automatic payment withdrawals.

New Low-Income Code Provisions for Electricity Distributors	Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers
<p>If the eligible low-income customer's electricity distributor bills monthly, they may request an equalized monthly billing plan</p>	<p><i>Enbridge's current policies and practices meet the intent of this rule. The Company is proposing no additional changes to</i></p>

without enrolling in an automatic withdrawal payment plan.

If their electricity distributor bills bi-monthly, they must be offered either a monthly or bi-monthly equal billing option.

policies and practices for low income customers and we believe that the Customer Service Policies and modifications already agreed to will be sufficient to protect all customers. Enbridge already offers customers the Budget Billing Plan (“BBP”), which is a program that helps spread annual gas costs evenly throughout the year. Enbridge does not require any of its customers joining its BBP to also sign up for an automatic withdrawal payment plan.

In addition, Enbridge has already agreed to amend its Customer Service Policies to allow customers in arrears to join the Company’s BBP. Enbridge customers who are in arrears and have entered into a payment arrangement will be permitted to join the BBP.

5. Disconnection for Non-payment

5a) Disconnection Period: A distributor must extend the disconnection notice period if the distributor is notified that a customer is being assessed for emergency financial assistance.

New Low-Income Code Provisions for Electricity Distributors	Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers
<p>Eligible low-income customers must be granted a disconnection suspension for 21 days after their electricity distributor is notified by a Social Service or Government Agency that they are being assessed for Emergency Financial Assistance.</p>	<p><i>Enbridge's current policies and practices meet the intent of this rule. The Company is proposing no additional changes to policies and practices for low income customers and we believe that the Customer Service Policies and modifications already agreed to will be sufficient to protect all customers.</i></p> <p><i>Disconnection action is suspended if there is notification from a social assistance agency of assessment of a customer's eligibility for payment assistance. Enbridge works with the customer on their individual circumstances; however, Enbridge has already agreed to amend its Customer Service Policies such that when Enbridge is notified by a registered charity, government agency, social service agency or a third party that an assessment or arrangement for payment is in process, disconnection action will be suspended for a period of 21 days.</i></p>

5b) Assistance Information before Disconnection: Disconnection Notices must inform customers that Emergency Financial Assistance and special arrears agreements may be available to eligible low-income customers.

New Low-Income Code Provisions for Electricity Distributors	Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers
<p>Information provided in the written Disconnection Notice, and in the telephone call 48 hours before disconnection, must include references to the special arrears payment agreement available for eligible low-income customers. The Disconnection Notice,</p>	<p><i>Enbridge's current policies and practices largely meet the intent of this rule. The Company is proposing a minor edit to the Disconnection Notice for all customers. The Disconnection Notice currently includes the date that the notice is issued, the</i></p>

and telephone call 48 hours before disconnection, must also inform customers that Emergency Financial Assistance may be available for eligible low-income customers, and that more information is available from their electricity distributor.

overdue amount to be paid, the forms of payment available at this late stage of collections and the phone number to call to report a payment and avoid disconnection.

In addition, Enbridge has already agreed to a system change to the information provided on a Disconnection Notice. The Disconnection Notice will be updated to include the earliest and latest date disconnection may occur, that Enbridge will work with the customer to arrange a suitable payment arrangement based on the customer's circumstances and to advise the customer that a disconnection may take place at any time whether or not the customer is home at the time.

Enbridge is also proposing to include information on Emergency Financial Assistance that may be available for eligible low-income customers in its Disconnection Notice and call before redlock.

6. Arrears Management Programs

6a) Down-Payment: A low-income arrears payment agreement is subject to a reduced down payment requirement.

New Low-Income Code Provisions for Electricity Distributors	Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers
<p>A down payment of up to 10% of the electricity charges accumulated plus any accumulated late payment charges (not including other service charges such as reconnection charges) may be requested the first time an eligible low-income customer enters into a low-income customer arrears agreement or after having successfully completed a previous such agreement.</p>	<p><i>Enbridge's current policies and practices meet the intent of this rule. The Company is proposing no additional changes to policies and practices for low-income customers and we believe that the Customer Service Policies and modifications already agreed to will be sufficient to protect all customers. Down payment requirements and length of payment arrangements are arranged based on the individual circumstances of each customer.</i></p>

6b) Repayment Time Periods: Eligible low-income customers are provided with extended periods of time to pay arrears depending on the amount owed.

New Low-Income Code Provisions for Electricity Distributors	Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers
<p>The time periods to repay arrears are extended to:</p> <ul style="list-style-type: none"> • 8 months if the amount owed is less than or equal to 2 times the customer's average monthly bill; • 12 months if the amount owed is more than 2 and less than or equal to 5 times the customer's average monthly bill; or • 16 months if the amount owed is more than 5 times the customer's average monthly bill. 	<p><i>Enbridge's current policies and practices meet the intent of this rule. The Company is proposing no additional changes to policies and practices for low-income customers and we believe that the Customer Service Policies and modifications already agreed to will be sufficient to protect all customers. If a customer is in arrears for any amount, Enbridge will work with the customer to determine a suitable payment arrangement based on that customer's circumstances and will also allow for multiple payment arrangements in a year. Enbridge believes that imposing timelines for payment arrangements is not in the best interest of the customer over the longer term and creates an artificial budget for the customer and promotes potentially</i></p>

	<p><i>overextending themselves even further. In addition, given that Enbridge will offer payment arrangements more frequently than this rule stipulates, the Company is more flexible now when working with customers and such a rule could limit the Company's ability to work with customers based on their circumstances.</i></p>
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6c) Service charges and late payment charges: Distributors are required to waive any non-payment related service charges and to not apply any additional late payment charges when an eligible low-income customer enters into an arrears agreement.

New Low-Income Code Provisions for Electricity Distributors	Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers
<p>Where an eligible low-income customer enters into an arrears payment agreement with a distributor for the first time or subsequent to having successfully completed a previous arrears payment agreement as an eligible low-income customer, the distributor must waive any service charges specifically related to collection, disconnection, non-payment or load control devices.</p> <p>No further late payment charges may be imposed on an eligible low-income customer after the customer has entered into an arrears payment agreement in respect of the amount that is the subject of that agreement. However, the distributor is not required to waive any late payment charges that accrue to the date of the arrears agreement.</p>	<p><i>Enbridge's current policies and practices are different from this rule. The Company is proposing changes to collections messaging for all customers to communicate our policy of working with customers in all stages of arrears.</i></p> <p><i>Enbridge works with customers to develop suitable payment arrangements for them based on their individual circumstances. The Company believes that it is appropriate for all customers, whose actions result in the Company incurring costs related to collections, disconnection and non-payment, be accountable for the payment of those charges. Most of these costs could be avoided by prompt action on the part of the customer, for example, calling the Company at the time they know that payment will be difficult. This would avoid additional collections and potentially disconnection costs from being incurred. The Company believes that the posting of Customer Service Policies on its website will facilitate and encourage customers to call and notify the Company of payment issues.</i></p> <p><i>Enbridge is proposing to change messaging provided to customers in arrears throughout the collections process to encourage them to call the Company so that we can work with them to educate them on services, funding available and negotiate payment arrangements. There are currently 7 touchpoints with the customer before a disconnection work order is initiated. These include outbound calls, messages on the bill and notices. . Updates to the communications will be implemented for all customers.</i></p>

6d) Payment Defaults: Eligible low-income customers must be allowed two payment defaults before a distributor may cancel an arrears agreement.

New Low-Income Code Provisions for Electricity Distributors	Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers
<p>Eligible low-income customers must be allowed two payment defaults before a low-income arrears agreement can be cancelled.</p> <p>The defaults must occur over at least 2 months.</p>	<p><i>Enbridge's current policies and practices largely meet the intent of this rule. The Company is proposing no additional changes to policies and practices for low-income customers and we believe that the Customer Service Policies and modifications already agreed to will be sufficient to protect all customers.</i></p> <p><i>Payment arrangements can be over days or over months. Enbridge has already agreed to a system change to issue a cancellation notice in writing to customers who miss a payment in a payment arrangement advising them that the cancellation of the payment arrangement will take place 10 days later. Such change will result in the customer being notified and allowing them sufficient time to contact the Company and amend their payment arrangement as needed. Again, we will work with the customer based on their individual circumstances.</i></p>

6e) Second or Further Arrears Payment Agreement: Eligible low-income customers are allowed to request a new arrears payment agreement after they have successfully completed a payment agreement. Depending upon the circumstances, the second arrears agreement may be a standard one or enhanced one.

New Low-Income Code Provisions for Electricity Distributors	Gas Distributors' Current and Proposed Modified Policies and Practices for Eligible Low-Income Customers
<p>If an eligible low-income customer successfully completes an arrears payment agreement, the customer can request a new agreement anytime needed thereafter. However, if a new agreement is requested within 12 months of the end of the prior successfully completed agreement, the distributor can offer the new agreement on the same terms as those provided to other residential customers even if the customer is an</p>	<p><i>Enbridge's current policies and practices meet the intent of this rule. The Company is proposing no additional changes to policies and practices for low-income customers and we believe that the Customer Service Policies and modifications already agreed to will be sufficient to protect all customers. If a customer is in arrears for any amount, Enbridge will work with the customer to determine a suitable payment arrangement</i></p>

eligible low-income customer.

based on that customer's circumstances and will also allow for multiple payment arrangements in a year. Enbridge already offers payment arrangements more frequently than this rule stipulates, and such a rule could limit the Company's ability to work with customers based on their circumstances.