

# **Board Staff Interrogatories**

**Toronto Hydro-Electric System Limited**

**Licence Amendment Application**

**EB-2011-0269**

**November 23, 2011**

1. **Reference:** Toronto Hydro-Electric System Limited's ("THESL") September 30, 2011 letter:

The activities described above have competed with THESL's ability to finalize until recently, the defining of the complex requirements associated with the regulatory customer service, collections and LEAP requirements that THESL's CIS vendor will use to develop code. However, THESL has now received an estimate from its vendor of a 58-week work effort (8,400 hours) to develop code; this will extend THESL's compliance date for full completion from the initial estimated date of June 24, 2012, to December 17, 2012.

**Questions:**

- 1.1. Please update the status of THESL's new CIS, including its progress on automating the requirements of the sections of the Distribution System Code ("DSC") and the Retail Settlement Code ("RSC") that are the subject of this application (the "Relevant Sections").

2. **Reference:** THESL's Application, page 2: "Through manual workarounds, THESL is compliant with most of the requirements set out in the Notice ...."

**Questions:**

- 2.1. Please indicate with which requirements of the Relevant Sections THESL is currently complying.
- 2.2. How does THESL determine compliance?
- 2.3. Why does THESL seek an exemption from the requirements with which it is currently in compliance?

**3. Reference:** Appendix A to THESL's Application:

DSC – Disconnection and Reconnection 4.2.2.4

An exemption is requested from calling 100% of our residential customers 48 hours prior to the disconnection of service.

**Questions:**

- 3.1. Please describe the process THESL uses for providing notice to residential customers who are in arrears and scheduled for disconnection.
- 3.2. Please confirm whether or not, since the coming into effect of 4.2.2.4 of the DSC, any of THESL's residential customers were disconnected by THESL without contacting the customer and providing the information required by section 4.2.2.4 of the DSC 48 hours prior to the disconnection of service? If yes, please provide the following information:
  - 3.2.1. number of customers disconnected;
  - 3.2.2. how was the issue identified (i.e. by THESL or by the customer)?;
  - 3.2.3. actions taken by THESL to rectify the situation; and
  - 3.2.4. whether the issue was resolved to the customer's satisfaction.

**4. Reference:** Appendix A to THESL's Application:

DSC – Conditions of Service 2.4.26A

An exemption is requested from applying 100% of the security deposits prior to issuing a disconnect notice.

**Questions:**

- 4.1. Please confirm that it is THESL's practice to honour a request from a customer, who has been sent a disconnection notice for non-payment, to apply the security deposit being held on account for the customer to the customer's outstanding arrears to avoid disconnection. If this cannot be confirmed or is incorrect, please explain why.

- 4.2. Please confirm whether or not, since the coming into effect of section 2.4.26A of the DSC, any of THESL's residential customers were disconnected by THESL for non-payment where the security deposit held on account for the customer was sufficient to cover the customer's outstanding arrears? If yes, please provide the following information:
- 4.2.1. number of customers disconnected;
  - 4.2.2. how was the issue identified (i.e. by THESL or by the customer)?;
  - 4.2.3. actions taken by THESL to rectify the situation; and
  - 4.2.4. whether the issue was resolved to the customer's satisfaction.

**5. Reference:** Appendix A to THESL's Application:

DSC – Bill Issuance and Repayment 2.6.5

Under the former CIS, THESL made modifications to decrease our late payment charges based on backdating the date of payments according to the payment type (3 days for mail and 2 days for payments made through financial institutions or electronically). An exemption is requested for the period of time up to approximately June 24, 2012 when the same modification is expected to be made to CC&B.

**Questions:**

- 5.1. Please advise when THESL begins to apply late payment charges to customers' bills.
- 5.2. Please confirm whether or not THESL has applied late payment charges to customers' bills as a result of using different rules than those prescribed for determining the date on which payment of a bill has been received from a customer. If yes, please provide the following information:
- 5.2.1. number of affected customers;
  - 5.2.2. how was the issue identified (i.e. by THESL or by the customer)?;
  - 5.2.3. actions taken by THESL to rectify the situation; and
  - 5.2.4. whether the issue was resolved to the customer's satisfaction.

**6. Reference:**

- Appendix A to THESL's Application:  
DSC – Reconnection Standards 7.10.2  
An exemption is requested from *the reporting requirement regarding reconnection standards*. THESL's normal operating procedure is to reconnect a service disconnected as a result of non-payment within 24-48 hours. However, the reporting structure needs to be developed to provide accurate reporting. This process will be automated in future modifications to CC&B. [emphasis added].
- Section 7.10.2 of the DSC: "This service quality requirement must be met at least 85 percent of the time on a yearly basis."

**Questions:**

THESL seeks an exemption from "the reporting requirement regarding reconnection standards". However, no reporting requirements have been prescribed in section 7.10.2 of the DSC.

- 6.1. Please identify the regulatory provision from which THESL is seeking an exemption including the name of the regulatory instrument and the section number if applicable.

**7. Reference:**

Appendix A to THESL's Application:  
RSC – Billing Errors 7.7.1  
An exemption is requested from the requirement to contact 100% of our customers with overbilling credit adjustments where the amount is greater than a one month average bill. The adjustments will be processed and THESL will be contacting the customers; however, since this is currently a manual process and reporting needs to be developed to identify every account that meets this criterion, some customers may not be contacted within the required timeframes. This process will be automated in future modifications to CC&B.

**Questions:**

- 7.1. With respect to the requirements of section 7.7.1 of the RSC, please confirm that THESL seeks an exemption *only from the timelines prescribed in section 7.7.1 of the RSC (i.e. within 10 days of determination of the error)* to notify the customer or retailer of the over billing and to advise the customer or retailer of the reimbursement options. Put another way, please confirm that THESL does not seek an exemption from the following requirements:
- notifying the customer or retailer of the error,
  - providing the customer or retailer with the reimbursement options, and
  - processing adjustments or payments as applicable within the prescribed timelines.
- 7.2. If the understanding summarized in item 7.1 above is incorrect, please provide a detailed description of the exemption sought.
- 7.3. Based on THESL's current manual processes, please provide the average timeframe for contacting customers or retailers whose accounts meet the criteria established in section 7.7.1 of the RSC.
- 7.4. Please confirm that all payments or bill adjustments as applicable are processed by THESL within the timelines prescribed in section 7.7.1 of the RSC. If not, why not.
- 7.5. Please estimate how many times, since the coming into effect of section 7.7.1 of the RSC THESL has identified that it had overbilled a customer by an amount greater than the average monthly bill?