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**Susan Frank**

Vice President and Chief Regulatory Officer  
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BY COURIER

February 10, 2012

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

Dear Ms. Walli:

**EB-2007-0722 – Invitation to Comment on Proposed Electricity Reporting and Record Keeping Requirements for Distributors Related to Revised Customer Service Rules**

On January 30, 2012 the Ontario Energy Board (“the Board”) requested comments on the proposed amendments to the Board’s Reporting and Record Keeping Requirements (Electricity RRRs) with respect to the electricity Customer Service Rules under file EB-2007-0722.

Hydro One appreciates that the comments and suggestions made at the December 15<sup>th</sup> working group meeting have been reflected in the January 30<sup>th</sup> proposed reporting requirements. Hydro One will be able to start to collect the proposed reporting requirements as of January 2013 in anticipation of filing by April 30, 2014.

In response to the Board’s invitation to comment on the more common practices for tracking “arrears”; currently Hydro One tracks and reports overdue arrears using buckets of 0-21 days, 22-59 days and 60-89 days. Hydro One suggests that the proposed reporting be based on the 22 – 59 day bucket. This time frame recognizes customers that have actual “financial” difficulty paying their bill.

The Board’s use of a Working Group to develop the proposed reporting requirements was an efficient approach. Hydro One promotes the future use of this process.

An electronic copy of these comments have been filed using the Board’s Regulatory Electronic Submission System.

Sincerely,

ORIGINAL SIGNED BY SUSAN FRANK

Susan Frank