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February 13, 2012

Ms. Kirsten Walli  
Ontario Energy Board  
PO Box 2319  
27<sup>th</sup> Floor, 2300 Yonge Street  
Toronto, Ontario M4P 1E4

**Re: Consultation on Proposed Electricity Reporting and Record Keeping Requirements for Distributors Related to Revised Customer Service Rules  
Board File No.: EB-2007-0722**

Dear Ms. Walli,

Chatham-Kent Hydro Inc. ("CKH") appreciates the opportunity to comment on the "Proposed Electricity Reporting and Record Keeping Requirements for Distributors", issued January 30, 2012.

If you have any questions or concerns, please do not hesitate to contact me at (519) 352-6300 ext 243 or via email at: [regulatory@ckenergy.com](mailto:regulatory@ckenergy.com).

Regards,

*[Original Signed By]*

Andrya Eagen  
Senior Regulatory Specialist  
Phone: (519) 352-6300 Ext. 243  
Email: [andryaeagen@ckenergy.com](mailto:andryaeagen@ckenergy.com)

CC: Dan Charron, President of Chatham-Kent Hydro  
Chris Cowell, Chief Financial and Regulatory Officer  
David Ferguson, Director of Regulatory Affairs and Risk Management

Chatham-Kent Hydro Inc. (“CKH”) welcomes the opportunity to provide the following comments on the “Proposed Electricity Reporting and Record Keeping Requirements for Distributors”, issued January 30, 2012:

Prior to the recent Customer Service Code (“CSC”) amendments, CKH did not identify the income status of customers in its CIS database. With the implementation of updated customer service rules in 2011, CKH began manually flagging applicable low income accounts with a text field message in order to identify accounts under the new CSC rules. It is understood by CKH that this approach is relatively common amongst electrical distributors.

In terms of the cost of reporting, as of February 2012, CKH has been advised by its CIS vendor that these text field messages can be utilized to generate the majority of the information needed to create the proposed reporting requirements. CKH has been further advised by the vendor that on a preliminary basis, the upgrades noted above will be covered under the terms of its regular service agreement. However, additional training and internal resource requirements will be at incremental cost to CKH. It should be noted that this vendor solution is in its development stages. Once CKH has had an opportunity to fully vet and review the proposed solution, it will be in a better position to provide a cost estimate for training and internal staff requirements.

The proposed reporting requirements request benchmark reporting for 2010, 2011 and 2012. As noted above, the process of manually flagging accounts for LEAP did not start until the beginning of 2011, and for that reason it would be very challenging for CKH to provide historical details at the level as requested. CKH understands the importance of benchmarking but believes that the cost of the potential amount of internal time required in this particular instance outweighs the benefit. The majority of the information now being requested was not tracked historically.

Lastly, CKH submits that additional clarification should be provided on how to handle the reporting of recurring LEAP accounts – those customers who come off and on various programs during the same year. For example, a customer may have a load limiter installed in January and then removed. The same customer could then have the load limiter installed again in November of the same year. For reporting purposes, would this account be reported once or twice since it was two separate instances?