



BY E-MAIL AND WEB POSTING

March 1, 2012

To: All Natural Gas Distributors

CC: All Participants in Consultation Processes EB-2010-0280, EB-2007-0722, EB-2008-0313 and EB-2008-0150
All Other Interested Parties

Re: Consultation on Low-Income Gas Customer Service Standards
Board File: EB-2010-0280

I. Background

On June 29, 2011, the Ontario Energy Board (the “Board”) issued a letter indicating it would be seeking stakeholder input in developing appropriate low-income customer service standards for rate-regulated natural gas distributors.

The letter explained that the objective of this consultation is to ensure there are customer service standards applicable to low-income gas customers that are fair, transparent, reasonably consistent and enforceable by the Board. In addition, the Board stated that the updated customer service standards were expected to provide greater protection and certainty for low-income customers while allowing rate-regulated gas distributors an appropriate measure of flexibility to account for their specific operational considerations.

In the June 29, 2011 letter, the Board proposed that the consultation take place in two stages. In the first stage, gas distributors were asked to review the recent low-income related customer service rules for electricity distributors posted on the Board’s website, document any current low-income related policies in the areas addressed by those

rules, and suggest new or modified policies that are appropriate for gas distributors. Attachment A to that letter provided a template for submission of this information.

In addition, gas distributors were asked to provide their views on the following questions:

1. 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?
2. 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 service, including a complaint process with recourse to the Board)?

Written submissions from Union Gas Limited ("Union") and Enbridge Gas Distribution Inc. ("Enbridge"), collectively called the "major gas distributors", and Kitchener Utilities ("Kitchener") a non rate-regulated gas distributor, were received on July 22, 2011 and posted for comment. No reply was received from Natural Resources Gas Limited ("NRG"), the third rate-regulated gas distributor in the province.

In the second stage of the consultation process, other stakeholders were invited to comment on the submissions made by the gas distributors and provide their own input on the questions above.

Three ratepayer groups, the Low-Income Energy Network ("LIEN"), the Vulnerable Energy Consumers Coalition ("VECC") and London Property Management Association ("LPMA"), filed comments in August 2011 on the distributors' July submissions. These submissions are available on the Board's webpage www.ontarioenergyboard.ca under the EB-2010-0280 project page.

A summary of the major points raised in the stakeholders' 2011 written submissions is provided in Part II. Board staff asked the gas distributors to clarify certain areas of their submissions. That additional information is included in Part III.

II. Stakeholders' Written Comments

A. Replies to Policy Questions from the Board

Union and Enbridge did not support creating and implementing different customer service policies and practices for their low-income customers. They believed that their existing customer service policies, along with the modifications to the customer service standards to be applied to residential customers previously described in their submissions to the Board posted on July 22, 2011 in response to June 29, 2011 Notice of Proposed Gas Distribution Access Rule ("GDAR") Residential Customer Service Amendments, will provide sufficient flexibility to create tailored solutions for all residential customers, including low-income customers. Therefore special low-income gas customer service rules are not needed. They also believed that more prescriptive rules would add costs and reduce their flexibility in addressing the needs of their customers.

Kitchener suggested that care must be taken in the development of any prescribed low-income gas customer service standards because of the additional costs and administrative burden required to implement and adhere to them. Kitchener joined with the other gas distributors in recommending a less prescriptive approach to the Board's oversight in this area, similar to the approach used for the development of the updated residential gas customer service standards and policies.

VECC recommended that the Board should prescribe an eligibility threshold for low-income natural gas customers (the same as for electricity customers), and that a minimum package of mandatory customer service rules should be provided for low-income gas customers based on the recent electricity sector low-income customer code amendments, except where a gas distributor already meets those standards. Gas distributors could retain the discretion to go beyond those rules in specific cases - for example, to offer the more flexible rules to non-qualifying customers. VECC also suggested that if gas distributors are to be allowed discretion in the customer services they offer their low-income gas customers, a clear and accessible complaints process should be established, particularly in cases where a low-income gas customer will not receive the same benefit of a rule already required by the Board to be offered to a low-income electricity customer.

LIEN stated that it was supportive of a less prescriptive approach, provided that:

- Customer service standards are fair and enforceable.
- There is consistency in standards across the regulated gas distributors, where appropriate, to ensure a reasonable balance between level of service needed and costs to provide this service.
- There are appropriate metrics and reporting in place to track regulated distributor performance regarding the adherence to the standards (also recommend consulting with stakeholders on these).
- Regulated gas distributors are required to include consultation with stakeholders as part of any low-income policy revision process, if an additional low-income policy component is put in place in the distributor's customer service policy.
- The policy should be reviewed every two years.

LPMA did not support development of mandatory low-income customer service rules for the gas sector. A prescriptive approach would incur implementation costs and increase rates for all gas customers. It recommended that the same customer service standards should be applied to all residential gas customers.

B. Comments on the Low-Income Customer Service Standards

The letter issued by the Board on June 29, 2011 included a table listing the following areas where gas distributors were expected to document any current low-income related policies, and suggest new or modified policies that are appropriate for gas distributors:

- a) definition of eligible low-income customers;
- b) security deposits;
- c) correction of billing errors;
- d) equal monthly payment and equal billing plans;
- e) disconnection for non-payment; and
- f) arrears payment agreements.

The two major gas distributors and Kitchener completed and submitted the table. No response was received from NRG. The three ratepayer groups had an opportunity to comment on the submissions from the gas distributors. The key submissions of the gas distributors, along with the replies to them from the three ratepayer groups, are summarized below.

a) Definition of Eligible Low-Income Customer

Union, Enbridge and LPMA did not see the need for any additional special low-income gas customer service policies and practices and therefore concluded that no purpose would be served by adopting a definition of eligible low-income gas customer. The major gas distributors suggested that their current and proposed modified customer service standards for all residential customers provide adequate protection based on each individual customer's situation, which may include economic or other circumstances. Kitchener indicated it accepts recommendations from Regional Social Services on whether or not a customer qualifies as low-income.

VECC recommended extending to the gas sector the same "eligible low-income customer" definition as approved in the electricity sector low-income customer code amendments. Gas distributors would remain free to provide additional flexibility to non-qualifying customers, while eligible low-income gas customers could look forward to a minimum set of enhanced customer service protections. LIEN did not provide comments on the eligible low-income customer definition.

b) Security Deposits

Both major gas distributors will waive security deposits if a customer provides a letter of reference from another utility or the customer has a previous residential account with good payment history.

Union indicated it will also waive a security deposit for customers who sign up for both its Equal Billing Plan and Automatic Payment Plan. Union further indicated that it may offer to reduce the amount of security required or to waive the deposit depending on the individual circumstances. Enbridge stated that it will waive a security deposit if a customer signs up for its pre-authorized payment plan. Kitchener indicated that security deposits are held until a tenant moves out of the property.

LIEN recommended that gas distributors should agree that, on a case-by-case basis, they would consider reducing the amount of a security deposit required or waiving the security deposit based on individual customers' circumstances.

VECC recommended that the electricity sector low-income customer service rules in this area should be extended by the Board to the gas sector, while LPMA believed that

no special low-income customer service rule is justified here for the gas sector given the flexible residential customer service standards adopted by the major gas distributors.

c) Equal Billing and Equal Payment Plans

Both Union and Enbridge indicated that they offer Equal Billing Plans (“EBP”) to all residential customers. There is no requirement for customers to agree to automatic payment withdrawals to be eligible to join an EBP.

Enbridge has agreed to allow customers who are in arrears and have entered into a payment arrangement to join its EBP plan. Union stated in its earlier February 17, 2011 submission in this consultation that while it does not automatically permit a customer on payment arrangements to join an EBP, it will work with such customers on a solution to combine arrears and an EBP at the request of the customer. Kitchener indicated its customers have the option of subscribing to an equal payment plan. Customers that are in arrears are allowed to sign up for an equal monthly payment plan any time of the year.

LIEN supported the major gas distributors’ proposals, subject to one change to allow customers to be able to access the above plans at any time of the year. LIEN expressed concern that some gas customers would have to wait until the fall to gain access to such plans.

VECC recommended that the electricity sector low-income customer service rules in this area should be extended by the Board to the gas sector. LPMA believed that no special low-income customer service rule is justified here for the gas sector given the flexible residential customer service standards adopted by the major gas distributors.

d) Under-Billing Adjustments

The major gas distributors stated that, where an under-billing adjustment is required, they seek to work with customers to determine a suitable payment arrangement based on that customer’s circumstances rather than following a pre-specified set of repayment periods for low-income customers. Union is prepared to include a message on bills with a significant adjustment to inform their customers to contact the distributor for the proposed options available. Kitchener did not indicate whether it provided more flexible payment terms to low-income customers in the case of under-billing adjustments.

LIEN recommended that gas distributors should include a message in their bills with a significant under-billing adjustment to inform customers to contact the gas distributor for payment options available.

VECC recommended that the electricity sector low-income customer service rules in this area should be extended by the Board to the gas sector, while LPMA believed that no special low-income customer service rule is justified here for the gas sector given the flexible residential customer service standards adopted by the major gas distributors.

e) Disconnection for Non-Payment

With respect to the length of time to be provided before disconnection may proceed, Enbridge stated it had already agreed that when the distributor is notified by a social service agency, government agency, registered charity or a third party that an assessment or arrangement for payment is in process, disconnection action will be suspended for 21 days. Union stated it currently allows two weeks for assessments but it is prepared to extend the agency assessment period to 21 days. Kitchener indicated that its customers receive 21 days notice from the time the final notice letter is mailed to the time of actual shut-off.

LIEN thought it was not fully clear whether Union's proposed modified 21-day suspension of disconnection policy would apply to a social service agency, government agency, registered charity or third party that notifies the distributor that an assessment or arrangement for payment is in process.¹ LIEN further recommended that the disconnection suspension should be applied by gas distributors in respect of notification from any of these organizations. LIEN further noted that the Winter Warmth program provided a 30-day extension to a customer who sought the assistance of a social service agency in resolving arrears and suggested the use of a 30-day time period here.

With respect to the information about available assistance which could be provided to customers before disconnection, Union indicated that it is prepared to implement a separate disconnection notice. The notice will inform customers, among other things, that Emergency Financial Assistance may be available for eligible low-income customers. In addition, at least one outbound telephone call is made prior to issuing a disconnection order.

¹ Union subsequently confirmed it would apply to all these agencies. The Board considers no issue to exist in this area.

Enbridge stated that it has already agreed to change the information provided on its disconnection notice to include a statement that the distributor will work with the customer to arrange a suitable payment arrangement based on the individual's circumstances. Enbridge also proposed to include information on Emergency Financial Assistance that may be available for eligible low-income customers in its disconnection notice and in its telephone call before disconnection.

Final disconnection notices sent out by Kitchener contain information on the amount to be paid by the due date or contact numbers for collection officers in order to ensure payment arrangements are made. An insert from the Region of Waterloo listing agencies that are available for providing financial assistance is also included in the information package.

LIEN recommended that gas distributors should adopt the practice of notifying the customer that the distributor will work with the customer to arrange a suitable payment arrangement based on the individual's circumstances.

VECC recommended that the electricity sector low-income customer service rules in this area should be extended by the Board to the gas sector, while LPMA believed that no special low-income customer service rule is justified here for the gas sector given the flexible residential customer service standards adopted by the major gas distributors.

f) Arrears Payment Agreements

In respect of the required minimum down payment before entering into an arrears payment agreement with low-income gas customers, the major gas distributors stated that they negotiate mutually acceptable arrangements based on an individual customer's situation. LIEN supported this approach.

In respect of the length of arrears repayment agreements offered low-income gas customers, Union stated that its arrears payment arrangements normally do not exceed two months in length; however flexibility based on the individual customer circumstances determine the overall payment plan elements. Enbridge indicated that it works with the customer to determine a suitable arrears payment arrangement based on that individual's circumstances.

Kitchener indicated that customers receive final notice when arrears age 40 days for tenants and 60 days for owners. If payment is not made by the due date specified, the customer has to make alternate arrangements with the collection officers.

LIEN supported the major gas distributors' approaches. LIEN also recommended that the gas distributors send a letter by mail to all customers defaulting on arrears payment agreements, advising of an immediate date that the payment due can still be made and providing a final date when disconnection will proceed after the payment default.

In respect of the treatment of service charges and late payment charges when low-income gas customers enter into arrears payment agreements, Union indicated that when payment in full is not made on or before the date shown on the bill, a delayed payment charge is applied to the outstanding balance; and when a payment arrangement is entered into, delayed payment charges are applicable to the remaining outstanding balance during the course of the agreement. Enbridge thought it is appropriate that all customers whose actions result in increased costs related to collections, disconnection and non-payment be accountable for the payment of those charges.

Kitchener indicated its policy is to charge interest on a utility bill only once.

On this issue, LIEN recommended that the Board require gas distributors to:

- Waive any service charges specifically related to collection, disconnection, and non-payment for a low-income gas customer that has entered into an arrears payment agreement with a gas distributor for the first time or subsequent to successfully having completed an arrears agreement.
- Not impose further late payment charges on a low-income gas customer after entering into an arrears agreement in respect of the amount that is the subject of that agreement. A distributor should not be required to waive any late payment charges that accrue to the date of the arrears agreement.

In respect of the number of payment defaults a low-income customer may make before the arrears agreement can be terminated by a gas distributor, Union stated that it works with customers to find mutually agreeable payment arrangements. Enbridge indicated that it had already agreed to issue a cancellation notice to customers who miss a payment under a payment arrangement advising them that the cancellation of the payment arrangement will take place 10 days later. Such a change will result in the customer being notified and should allow the person sufficient time to contact the distributor and amend the payment arrangement as needed. Kitchener indicated its

collection officers continuously work with low-income customers on payment options. LIEN indicated that it supported the gas distributors' approaches on this issue.

As to when a low-income gas customer may enter into a second or further arrears payment agreement, the major gas distributors indicated that payment arrangement plans are worked out with customers on a case by case basis, with multiple opportunities for a customer to work with the distributor on a mutually satisfactory arrangement. There is no predetermined number of arrangements under which a customer is eligible within a calendar year. Kitchener indicated its collection officers continuously work with low-income customers on payment options. LIEN stated that it supported the gas distributors' approach on this issue.

III. Board Comments

The Board has considered the written comments provided by gas distributors and ratepayer groups. Board staff subsequently obtained further clarifications from the gas distributors regarding certain customer service policies and practices. This additional information is summarized under the relevant headings below.

In each section below, the Board indicates where it is reasonably satisfied that the gas distributors' proposals meet the Board's customer service objectives, where the Board views there to be a deficiency or where the Board views one distributor's proposal as the preferred approach.

For those areas where the Board is satisfied with the gas distributors' proposals, the Board will take the same approach which it has for the residential gas customer service rules generally. In other words, the Board will not adopt a prescriptive approach and will instead require the gas distributors to document their policies, post them on their websites and make them available to customers, and to adhere to those policies.

For those areas where the Board is not yet satisfied with the gas distributors' proposals, the Board requests the distributors to respond to this letter, indicating whether they intend to adopt the best practice identified. If they do not propose to adopt the recommended approach, they should provide further comments as to why the approach is not appropriate in their view. Once the Board has reviewed these responses from the distributors, the Board will determine whether there is a need to proceed with a more prescriptive approach for low-income gas customers in those areas.

a) Security Deposits

The major gas distributors waive security deposits when a customer provides a letter of reference with a good rating from another Canadian utility or has moved within the same utility's service area and the previous account had a good payment history.

Enbridge stated that it will also waive its security deposit if a customer joins its pre-authorized payment plan, but not if the customer joins only its equal billing plan without a pre-authorized payment feature. Union stated it will waive its security deposit if a customer joins both its equal billing plan and its automatic payment plan. The waiver will not extend to a customer who joins an equal billing plan alone. Union further indicated that it may offer to reduce the amount of security required or to waive the deposit depending upon the individual circumstances. Enbridge did not include a similar statement in its submission.

The Board is satisfied that these policies assist all customers including many low-income customers of gas distributors. It appears, however, that they will not benefit the low-income gas customers who lack an account with a financial institution and therefore cannot join a pre-authorized payment plan. The Board therefore expects the gas distributors to modify their customer service policies to also waive security deposits for **low-income customers**² who do not have an account with a financial institution and are willing to enroll in an equal billing plan. Implementing such a change will encourage low-income customers to join an equal billing plan, which could benefit both the customer and the utility as payment patterns may improve.

Another area of concern to the Board is low-income customers using funds from the Low-Income Energy Assistance Plan ("LEAP") Emergency Financial Assistance and/or Winter Warmth Program to pay security deposits. Union clarified that Winter Warmth funds are not being used to pay security deposits. Enbridge indicated that if a customer has been disconnected for non-payment and wishes to be reconnected and has been approved for Winter Warmth or LEAP Emergency Financial Assistance funds, then the funds will be used to pay any security deposits required for reconnection in addition to any arrears that are on the account.

LEAP Emergency Financial Assistance and Winter Warmth Programs are intended to provide funds to pay arrears, not security deposits. If gas distributors modify their

² Comments by the Board on how to identify low-income customers are provided in section f) below.

policies in this area so that a low-income customer that is willing to enroll in an equal billing plan will also have its security deposit waived, there would be no need to apply these funds to a security deposit. The Board recognizes, for those customers without an account with a financial institution, that the combined desirability to a) have those low-income customers that wish to have their security deposit waived be on equal billing plans and b) to have assistance funding offset arrears rather than security deposits, results in those who receive assistance and who do not provide a security deposit being effectively required to enroll in an equal billing plan. This will promote continued access to utility services for low-income customers as the available emergency assistance funding can be focused on paying down arrears.

b) Correction of Billing Errors

The Board is satisfied that the proposed customer service standards and practices of Enbridge and Union in the areas of correction for billing errors are generally flexible enough to accommodate the needs of the low-income gas customers. As summarized above, a minor difference between Union and Enbridge has been identified by stakeholders in this area. Specifically, Union has submitted that it includes a message on bills with significant under-billing adjustments to inform the customer to contact the distributor for payment options available. Enbridge informed Board staff that in these situations, it does not include a message for the customer to contact the utility and suggested that the customer typically calls the utility to discuss payment options available.

The Board considers Union's policy to reflect the best practice in this area, which is to include a message with a significant under-billing adjustment to inform customers that they may contact the utility to discuss payment options. The Board expects Enbridge, and other gas distributors, to consider adopting policies similar to Union's policy in this area.

c) Equal Monthly Payment and Equal Billing Plans

Kitchener allows residential customers that are in arrears to sign up for an equal monthly payment plan any time of the year. They advised Board staff that they also offer an equal billing plan which a customer can join at any time of the year. However, the two major gas distributors indicated in their submissions that they do not allow customers to join an equal payment or equal billing plan during the non-heating season.

The two major gas distributors subsequently provided further information to Board staff clarifying their current practices and the rationale behind them. It was explained that when these plans were originally designed, it was thought that no customer would have a practical interest in joining an equal billing or payment plan during the summer months when the residential gas consumption is the lowest. As a result, gas distributors take advantage of these low gas consumption months to true up these plans for the year.

Union has informed Board staff that it will offer year round access to equal billing and payment plans starting this year. Some customers that were joining the plans during the non heating season wanted to take advantage of the security deposit waiver offered by Union. As a result, the utility was processing these customer applications manually. This was a costly approach and when their system was being revamped recently, Union decided to offer customers year round access to joining such plans.

Enbridge has confirmed that year round access to equal billing plans is not available to its customers. It clarified that if a customer requests to join a plan after February, implementation will be deferred until September, the start of the next year's plan. They explained that after the month of February, consumption drops significantly and so the utility expects that the benefits of joining an equal billing plan at that time also drop significantly.

The Board believes that allowing low-income customers year round access to equal billing and equal payment plans will be a valuable option that will assist them in better managing payments. Kitchener and Union already do so and the Board considers it to be the preferable policy option in this area for all gas distributors to follow. If a low-income gas customer facing bill payment problems over the spring or summer approaches an agency for assistance, the Board believes it would be appropriate for the customer to have all the options available, including emergency financial assistance, waiver of a security deposit, entering into an arrears agreement for remaining overdue payments and also entering into an equal billing or payment plan to better manage future payments.

The Board expects Enbridge and other gas distributors currently applying time restrictions in this area to consider allowing their **low-income customers** to access equal billing and payment plans any time of the year. Enbridge and other gas distributors in a similar situation may wish to consider the business case for offering all residential customers year round access to equal billing and payment plans, as Union plans to do starting this year.

d) Disconnection for Non-Payment

The gas utilities are currently following different practices as to whether a message is included on disconnection notices stating that the distributor will work with a customer to arrange a suitable arrears payment agreement.

Enbridge indicated that it does include a separate notice to that effect, while Union stated that it does not. However, Union clarified that prior to receiving a disconnection notice customers will have received at least two bill messages and two outbound telephone calls encouraging them to call to make payment arrangements. The Board is satisfied that the two major gas distributors have policies that meet the Board's customer service objectives in this area.

*e) Arrears Payment Agreements*Late Payment Charges

Both Union and Enbridge indicated that they will work with a customer to determine a suitable arrears payment arrangement based on individual circumstances.

Further clarification was provided about how gas distributors treat late payment and other service charges when low-income gas customers enter into arrears payment agreements. For customers facing disconnection for non-payment both Union and Enbridge apply late payment charges of 1.5% per month.

The gas distributors confirmed that a customer will be responsible for late payment charges accrued for the period until entering an arrears agreement. The utilities differ as to whether, after a customer enters into an arrears agreement, late payment charges are levied on the outstanding balance during the course of the agreement. Kitchener stated that there are no further late payment charges on the outstanding amount once the customer enters into an arrears agreement. Union and Enbridge stated that they continue to levy late payment charges on the balance due during the course of the arrears agreement.

The Board finds Kitchener's approach of not imposing further payment charges after a customer enters into an arrears agreement to be the preferable policy option in this area. This will allow low-income customers to focus on paying down the principal

amount outstanding and maintaining their regular utility bill payments. The Board expects Union, Enbridge and other gas distributors to consider adopting Kitchener's or similar approach in this area.

Disconnection Charges

In addition to the late payment charges discussed above, if a customer is disconnected Union and Enbridge apply \$65 and \$70 charges respectively. None of the gas distributors waive disconnection charges for customers that enter into an arrears agreement. The major gas distributors provided further comments to Board staff about payment patterns over the year that are important to consider when deciding on the appropriate treatment of disconnection charges in the context of customer arrears agreements.

The major gas distributors indicated that they make an extra effort to find alternatives to disconnecting residential customers for non-payment during winter months. Both major gas distributors have some customers who let their arrears grow over the winter and in spring make payments to avoid being disconnected, while other customers, who have alternative sources of energy, let their arrears grow over the winter, are disconnected in spring, and then only ask to be reconnected later in the fall.

The Board is satisfied with the current policies of the major gas distributors in this area. As a result, the Board will not require the waiving of disconnection charges for low-income gas customers entering into arrears payment agreements.

f) Definition of Eligible Low-Income Customers

In order to implement the changes proposed above to the customer service policies with respect to low-income customers, the Board proposes that gas distributors use the same eligibility criteria for low-income customers that are applied for the LEAP Emergency Financial Assistance program.

g) Concluding Comments

As indicated above, the Board expects gas distributors to consider further changes to their proposed customer service policies in the areas where the Board is not yet satisfied with them. The Board requests gas distributors to respond and indicate whether they will adopt the proposed approach or a similar approach in each customer

service area discussed above, and if not, why. Once the Board has received these responses from the distributors, the Board will determine whether there is a need to propose GDAR low-income customer service amendments in those areas.

In respect of NRG, the Board expects it to comply with the residential customer service rules set out in the GDAR amendments that will come into effect on April 1, 2012. According to section 8.2 of the GDAR, NRG must file a copy of its updated Customer Service Policy with the Board and advise its customers as to where its Customer Service Policy may be viewed. The Board also expects NRG to develop low-income customer service policies and practices that are similar to those to be adopted by the other rate-regulated gas distributors following the conclusion of this consultation.

The Board encourages the non rate-regulated natural gas distributors to review the updated customer services standards of the major gas distributors and carefully consider to what extent residential customers, including low-income customers, in their service areas should receive similar treatment.

IV. Reporting Requirements

The Board believes that developing effective customer service monitoring and reporting requirements is important to ensure that the updated gas-sector residential customer service standards are achieving their intended objectives.

The Board plans to initiate a separate consultation process in this area later in 2012. The scope will be determined after reviewing the gas distributors' comments in response to this letter and their final updated Customer Service documents expected to be issued by gas distributors later on this year. The options to be examined in the reporting requirements review may include detailed customer complaint tracking and reporting processes, especially in the areas of low-income customer service policies to ensure that low-income customers are receiving customer service that adequately take into account their circumstances.

VII. Comments by Gas Distributors

Gas distributors are invited to provide comments regarding the implementation of the specific changes identified by the Board in Part III above by **March 12, 2012**.

The Board believes that the written submissions already provided by ratepayer groups are adequate to address the underlying issues regarding appropriate customer service policies for low-income gas customers. Therefore no additional comments are requested from these parties and no further costs will be awarded to them.

Two (2) paper copies of each comment submitted must be provided, and should be sent to:

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

The Board requests that interested parties make every effort to provide electronic copies of their comments in searchable/unrestricted Adobe Acrobat (PDF) format, and to submit their comments through the Board's web portal at www.errr.ontarioenergyboard.ca.

A user ID is required to submit documents through the Board's web portal. If you do not have a user ID, please visit the "e-filings services" webpage on the Board's website at www.ontarioenergyboard.ca, and fill out a user ID password request. Additionally, interested parties are requested to follow the document naming conventions and document submission standards outlined in the document entitled "RESS Document Preparation – A Quick Guide" also found on the e-filing services webpage. If the Board's web portal is not available, electronic copies of filings may be filed by e-mail at boardsec@ontarioenergyboard.ca.

Those that do not have internet access should provide a CD containing their comments in PDF format.

Comments to the Board must be received by the Board Secretary by **4:45 p.m.** on the required date. They must quote file number **EB-2010-0280** and include your name, address, telephone number and, where available, your e-mail address and fax number.

This letter and all further comments received by the Board will be available for public inspection at the office of the Board during normal business hours and on the Board's website at www.ontarioenergyboard.ca.

If the written comment is from a private citizen (i.e., not a lawyer representing a client, not a consultant representing a client or organization, not an individual in an organization that represents the interests of consumers or other groups, and not an individual from a regulated entity), before making the written comment available for viewing at the Board's offices or placing the written comment on the Board's website, the Board will remove any personal (i.e., not business) contact information from the written comment (i.e., the address, fax number, phone number, and e-mail address of the individual). However, the name of the individual and the content of the written comment will be available for viewing at the Board's offices and will be placed on the Board's website.

Any questions relating to this consultation should be directed to John Vrantsidis at 416 440-8122 or by e-mail at John.Vrantsidis@ontarioenergyboard.ca. The Board's toll free number is 1-888-632-6273.

Yours truly,

Original Signed

Kirsten Walli
Board Secretary