



NATURAL RESOURCE GAS LIMITED

Supporting Your Natural Gas Lifestyle

June 14, 2012

Ms. Kristen Walli
Board Secretary, Ontario Energy Board
2300 Young Street, 27th Floor
Toronto, Ontario M4P 134

Dear Ms. Walli:

**RE: Consultation on Low-Income Gas Customer Service Standards
Ontario Energy Board File No EB-2010-2080**

On March 20, 2012 Natural Resource Gas Limited submitted comments in response to the Board's request that Rate Regulated Utilities develop Low-income Customer Service Standards.

Natural Resource Gas Limited is pleased to submit the following Proposed Additional Revisions to our Customer Service Policy focusing on modifications regarding Low-income residential customers.

Upon approval by the Board, these revisions will be incorporated into our current Gas Customer Service Standards and made available to all residential customers within our franchise area.

Respectfully submitted

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General Manager



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Enclosures

NATURAL GAS DISTRIBUTORS: CUSTOMER SERVICE AMENDMENTS TO THE GDAR (EB-2010-0280)

Natural Resource Gas Limited is submitting the following changes to our Customer Service Policy specific to the items listed below:

1. That security deposits should be waived for Low-income customers enrolled in the equal billing program.
2. That late payment charges should not be imposed on Low-income customers who enter into an arrears payment agreement.
3. Allowing customers to join the equal billing Plan any time of the year
4. Message to be included on bills with under-billing to inform customer to contact NRG for payment options available.
5. Amount of time NRG allows customers to pay a security deposit from 4 months to 6 months.
6. NRG does not take into account any security deposit held before issuing a disconnection for non –payment notice to customer. Other major gas distributors have indicated they will start doing this.
7. NRG's updated Conditions of service for 16 days payment period, but do not address when a bill is considered issued Enbridge and Union have effectively address this issue in their update Conditions of Service.

NRG is willing to make improvements to the customer service policy, by implementing the following changes.

1. Security Deposits

NRG will amend our present security deposit policy to allow residential customers to pay security deposits from a four month period, to a maximum of six monthly installments. If the customer should fail to pay the security deposit over the time allowed, the delivery of gas will be discontinued. Once the account is paid in full, including the outstanding security deposit, the reconnection charge, NRG will reconnect the service within two business days.

Security deposits for residential customers will not be required if:

- a customer must have a beacon score of 680+ and less than 50% credit utilization
- If a customer can provide letter of reference from another gas/ electrical company in Canada confirming good payment history
- Customer enrolls in Automatic Withdrawal

NRG proposes the following amendments to the Security Deposit Policy for low income residential customers:

Definition of Low Income-customer

- NRG will use the criteria established under the LEAP Financial Assistance Program
- A social or government agencies confirms the Low-income customer's designation.
- The designation of low income is for a period of 2 years, at which time that customer will be re-assessed as Low-income.

Security Deposit Amendments

- Customers must qualify as Low income customer, as set out by the Definition of a Low-income customer
- Security Deposits will be waived for Low-income customers who do not have an account with a financial institution, and wish to enroll in our Equal Billing Plan.
- The waiver would not apply to customers having been subject to disconnection during the preceding 12 month period.
- Should a customer who has had their security deposit waived under this condition, be disconnected for non-payment at a future date, a security deposit would be waived provided, the Low-income customer has fulfilled the terms of a payment arrangement for the previous 12 month period.
- In the event the Low-income customer should default, or cancel any payment arrangement in the previous 12 months. A security deposit may be required, thus encouraging customers to keep payment arrangements.

Natural Resource Gas Limited is prepared to amend the requirements for low-income customers who enter into a payment agreement.

2. Late Payment Charges for Low-income customers with a payment agreement

Late payment charges will be applicable to any outstanding balance up to the time that the Low-income customer enters into an arrears agreement.

Late payment charges associated with the "active" payment arrangement will not be charged on the amounts associated with the payment arrangement.

Once the payment arrangement has been satisfied, then late charges will resume on any future balances.

In the event that a Low-income customer cancels, or defaults on a payment agreement, then the option to have late payment charges waived in respect to the applicable arrears will no longer apply.

The Low-income customer benefits in keeping the payment arrangements, as the late fees are negated under this arrangement.

NRG will continue to allow late payment charges to be waived for that customer on any future payment agreements for a period of two years, at which time the customer must be reassessed as low-income.

NRG will continue to maintain its flexibility in individual customer's circumstances in offering payment arrangements.

3. Equal Billing Plan

NRG will amend the customer service policy to allow all residential customers to enroll in the Equal Billing Plan any month of the year.

(The Equal billing Plan reconciliation will always occur in May)

4. Under-billing

Regarding the notification of under-billing, NRG is will amend the customer service policy, to contact the customers with a significant under-billing adjustment, that payment options are available.

5. Disconnection for non-payment

NRG will take into consideration in determining whether to issue a disconnection notice or to pursue additional payment arrangements with the customer, any paid security deposit that is being held on the customer's account.

6. Payment period

NRG will amend the current 16 day payment period, and increase the period of time before a late payment charge applies to a 20 day time period from date bill is issued.

Implementation Date

To co-ordinate the changes associated with these amendments, we propose date an implementation of January 1, 2013.

Implementation Costs

Natural Resource Gas Limited will track and monitor associated costs for future submission and recovery.