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January 18, 2013

**VIA RESS, E-MAIL & COURIER**

Ms. Kristen Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Re: Ontario Energy Board File No.: EB-2010-0280**  
**Notice of Proposal to Amend a Rule – Customer Service Amendments to the**  
**Natural Gas Reporting and Record Keeping Requirements**  
**Submission of Enbridge Gas Distribution Inc.**

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On December 13, 2012 the Ontario Energy Board gave notice under section 45 of the *Ontario Energy Board Act, 1998* of proposed customer service-related amendments to the Natural Gas Reporting and Record Keeping Requirements Rule for Gas Utilities ("Gas RRR"). The proposed amendments will require rate-regulated gas distributors to report on their application of the updated residential and eligible low-income customer service policies that they committed to in the EB-2010-0280 consultations. Interested parties were invited to provide comments on the proposed amendments by January 18, 2013.

Enbridge Gas Distribution ("Enbridge") supports most of the proposed customer service-related amendments to the Gas RRR. Where Enbridge does not support these amendments, or wishes to provide further clarification, an explanation has been provided below.

**Number of Customer Accounts and Amount of Arrears**

The Board is requesting that several breakdowns of the number of customer's accounts and the total dollar values of arrears amounts be reported as at year end. Under the current Open Bill Agreement Enbridge provides billing services to customers who are not receiving gas delivery but are paying for products and services provided by another

Company. Enbridge will be including any non-gas customers in these totals for ease of implementation and to be consistent with its current reporting practices.

### Section 3.3 Amount of Arrears and Aging of Arrears

The Board requests that arrears be broken down into different aging periods (for example 31 to 60 days overdue). When an active Enbridge customer (i.e., one that is currently receiving delivery of gas) has not paid their account in 61 days, they would have a portion of their arrears in the 61 to 90 day period and a portion in the 31 to 60 day period. Enbridge will continue to report on these customers as it does today.

The issue identified above does not apply to customers who have closed their accounts. When an account has been moved out and is no longer receiving gas delivery the arrears will age and move in total from one period to the next.

### Section 4.3 Customer Service-Related Enquiries to be reported

The Board has proposed adding requirements to report information on the total number of customer service-related enquiries Distributors receive from their residential customers. Enbridge's current systems cannot support this request. Enbridge can only track total enquiries from "Mass Market" customers which combines residential and small commercial. To accommodate such a request would require significant and costly changes to Enbridge's Interactive Voice Response ("IVR") system. Enbridge proposes simply reporting on all enquiries in total from both residential and small commercial customers. This information will still provide the Company and the Board with valuable comparative data with which to assess customer service-related enquiries.

The Board has also proposed that customer service-related enquiries be reported in the same 41 sub-topic areas identified for complaints reporting in Section 4.2 of the Notice of Proposal to Amend a Rule. This also would require significant and costly changes to both Enbridge's IVR system and its Customer Information System to realign call codes and interaction record types. There are approximately 90 call codes in use today which align to Enbridge business processes and would not directly align with these required sub-topic areas. Re-aligning these call codes would be a significant system change, and would result in an extensive Change Management exercise to train over 250 Customer Service Representatives on how to use these new topics. In addition, there would be a substantial customer impact as Enbridge's 2 million customers would need to become familiar with a new IVR with different options, resulting in a negative impact on the Company's customer experience and customer satisfaction when these updated customer-service policies are intended to improve both.

As noted above, Enbridge's recommendation is to use total customer enquiries, including residential and small commercial, with no breakdown into sub-topics, thereby removing the need for these significant system changes and negative customer impacts.

January 18, 2013  
Ms. Kristen Walli  
Page 3 of 3

Implementation Costs

As stated in previous submissions, there will be costs and other financial impacts associated with implementing the changes to Enbridge's systems and processes to report on these proposed amendments to the Gas RRR. Enbridge intends to record its actual costs related to these changes as well as any ongoing operational impacts to the Gas Distribution Access Rule Costs Deferral Account ("GDARCD") in the same manner that the Company has captured the impacts from other customer service rule changes. The Company will seek the clearance of these amounts at the same time as other deferral and variance accounts are addressed. These costs will be substantial if Enbridge is required to report information on the number of customer service-related enquiries in the manner currently proposed.

Yours truly,

[original signed]

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