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February 5, 2013

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

Dear Ms. Walli:

Re: EB-2010-0280 – Submission on Customer Service Amendments to the Natural Gas Reporting and Record Keeping Requirements

Joint Submission from Enbridge Gas Distribution Inc. and Union Gas Ltd.

On January 18, 2012 Enbridge Gas Distribution (“Enbridge”) and Union Gas (“Union”) filed with the Ontario Energy Board its submissions with respect to the Ontario Energy Board’s proposed customer service-related amendments to the Natural Gas Reporting and Record Keeping Requirements Rule for Gas Utilities (“Gas RRR”). At that time other interested parties also provided submissions on the same proposed amendments. In particular, the Low-Income Energy Network (“LIEN”) filed its submission including proposed further additions to the Customer Service Amendments to the Gas RRR.

We write on behalf of Enbridge and Union, to set out our position in relation to LIEN’s submission. As set out below, Enbridge and Union do not believe that the additional items proposed by LIEN are appropriate or necessary. Our comments are organized in the same order as LIEN’s submission.

1. Section 2.1.18 (b) – Disconnections for Non-Payment

LIEN suggests that there should be six additional annual reporting items related to Disconnections for Non-Payment. LIEN is requesting arrears payment agreement details on disconnections.

It is important to note that Enbridge and Union do not disconnect customers with an active arrears payment agreement. If there is a disconnection, it is only after an arrears payment agreement has been cancelled. The companies provide cancellation notice of any payment agreement that is not maintained. In that event, the account would then revert back to the collection process in effect at the time the payment agreement was set up, which could mean that the account will receive a reminder notification or possibly a disconnection for non-payment. Therefore, at the point of disconnection, the payment agreement would have already been cancelled.

Enbridge and Union note that it would be difficult to track and report on which of their disconnections relate to customers who had previously had an arrears payment arrangement. Moreover, the companies question whether such information would add value over and above what is already proposed related to cancelled payment agreements in Section 2.1.18 (e) of the proposed Gas RRR.

2. Section 2.1.18 (e) – Arrears Payment Agreements

The Board's proposed additions to the RRRs included eight items of reporting related to Arrears Payment Agreements. LIEN proposes to add 12 more items of reporting (for a total of 20 items). Enbridge and Union submit that the additional items suggested by LIEN are unnecessary and excessive.

LIEN has requested reporting on the average arrears and average length of time associated with arrears payment agreements. The average amounts can be calculated from the information that will already be provided – number of accounts and total dollar values (section 2.18(e)(i) to (iii)). Additionally, information about the number of arrears payment agreements in each of six duration categories will also be provided (section 2.18(e)(vii) and (viii)), so there is no need for calculations of “average” length of time for repayment.

With respect to LIEN's proposal for reporting upon details of declined payment arrangements, Enbridge and Union note that a declined arrears payment agreement would be rare and would only occur if a customer had a previous payment agreement that was not maintained. Both Enbridge and Union work with customers to agree on a suitable agreement that works based on their individual circumstances. In addition, if a payment agreement was declined, there would be no way for the companies to report on this given that there would be no payment agreement noted on the account. For this reason, providing numbers of customers that have been declined would add limited value and would not be possible to report on.

Enbridge and Union would not be able to provide the proposed reporting on arrears payment agreement recipients who participated in DSM programs. Activities on the DSM program are not tracked and reported in the same way as billing information and it would not be possible to provide this level of breakdown.

Enbridge and Union would not be able to provide the proposed reporting related to customers with arrears payment agreements who have had security deposits waived in whole or in part. Security deposits are requested at the time an account is opened with the companies. The account could have been opened a number of years prior to entering into any payment agreements. In addition, if a security deposit was waived, that fact would not be noted on the account, there would simply be no security deposit requested.

In relation to LIEN's final additional reporting proposal, both Enbridge and Union have agreed to waive late payment fees for low income customers who enter into a payment agreement. This is the only circumstance where late payment fees are being waived, therefore this information is already effectively being provided in the number of payment agreements being provided for low income customers under Section 2.1.18 (e) (ii) of the proposed Gas RRR.

3. Consultation Annually with Stakeholders on Customer Service Policy

In regard to LIEN's suggestion for consultation annually with stakeholders, Enbridge and Union believe the collection of annual gas customer service RRR reporting over a number of years is first needed to demonstrate trends and potential impacts. Then, as the Board suggested in Section 7.2 in its Notice of Proposal to Amend a Rule an assessment of the impact of the revised customer service policies can be undertaken, if necessary.

As a final note, and as stated in previous submissions, there will be costs and other financial impacts associated with implementing the changes to Enbridge and Union's systems and processes to facilitate additional reporting of customer service activities. Such costs will increase if LIEN's proposed additions to the RRRs are approved. Enbridge and Union intend to record their actual costs related to the changes as well as any ongoing operational impacts in appropriate deferral accounts, for later disposition.

Should you have any questions about this submission, please contact me.

Sincerely,

[original signed]

Robert Bourke
Senior Manager, Regulatory Proceedings

c.c.: Crawford Smith (Torys)
Marian Redford (Union Gas Limited)
LIEN and Interested Parties