



October 9, 2014

Board Secretary
Ontario Energy Board
27th Floor/ P.O. Box 2319
2300 Yonge St.
Toronto, ON M4P 1E4

Dear Ms. Walli,

Re: EB-2014-0198 Draft Report of the Board – Electricity and Natural Gas Distributors’ Residential Customer Billing Practices and Performance

Halton Hills Hydro Inc. (“HHHI”) thanks the Board for the opportunity to comment on the Draft Report of the Board – Electricity and Natural Gas Distributors’ Residential Customer Billing Practices and Performance.

The June 27, 2014 Board letter indicated that “the goal is to give more customers a better understanding of their energy consumption in a timely and accurate manner so they can better manage their consumption and control their costs” [emphasis added].

Timely and Accurate:

HHHI bills Residential customers bi-monthly. HHHI believes that the Board’s goal to provide information in a timely and accurate manner is still being met. HHHI Residential customers have access to hydro consumption on a daily basis through HHHI’s robust and fully accessible AccountOnline web presentment (<https://click2gov.haltonhillshydro.com/Click2GovCX/Index.jsp>). AccountOnline is integrated with the province’s MDM/R system, and provides a simple facility for graphical viewing of electricity consumption related costs.

In addition to AccountOnline, HHHI has promoted the Ontario Power Authority’s Peaksaver Plus program that provides an in-home, easy-to-use electricity monitor that is connected to the meter and provides near real-time feedback on how electricity is being consumed in the home. The in-home display can show the amount of electricity being consumed at a particular time, the difference in consumption caused by turning various electrical appliances on and off, and the cost of the electricity consumption, based on current electricity rates.

HHHI submits that the AccountOnline and in-home display are, in fact, better tools to provide customers with timely and accurate energy consumption information.

Manage Consumption:

AccountOnline provides data tables and graphs to help customers understand their usage patterns and how they use electricity based on time-of-use.

Through AccountOnline, customers are able to request predictions and alerts that will provide notification to the customer should their consumption exceed the threshold they have requested. Additionally, the customer can request an alert should a specifically requested dollar value be exceeded. This alert function provides the customer with near real time warnings, allowing the customer to adjust and better manage their consumption.

HHHI has also used an application extension of AccountOnline for all major smartphone platforms (including Android, BlackBerry® and iPhone) which enable HHHI's customers the convenience of monitoring and managing their consumption while on the go.

Control Costs:

Residential customers are able to see graphs that provide estimated charge calculations at near real time through the web presentment.

As stated earlier, through AccountOnline, customers are able to request predictions and alerts that will provide notification to the customer should their consumption and/or estimated charges exceed the threshold they have requested, thus allowing customers to better take control of costs.

Additionally, Residential customers continue to have the option of a monthly equal payment plan to allow for a more even distribution of costs throughout the year. At the end of 2013, HHHI had twenty-one percent (21%) of Residential customers on equal monthly payment plans.

Billing Frequency

The above notwithstanding, HHHI is able to bill Residential customers monthly, however, there would be additional costs as a result of increased staffing, postage and printing costs. HHHI has estimated the one-time and ongoing costs associated with a change to monthly billing. These costs, net of possible resultant savings, are shown in the Table below.

Description	Amount (\$)
One-time costs	\$ 10,000
Monthly incremental on-going costs (net of savings)	\$ 26,200

HHHI would require a minimum of six (6) months, after a decision by the Board, before HHHI could achieve complete monthly billing.

Estimated Billing

The MDM/R has been established as the provincial repository for data calculation and aggregation into time of use periods. The MDM/R provides the estimated data based on established processes approved by Measurement Canada. HHHI recommends continuing to utilize the MDM/R for read estimation.

In the event of an MDM/R malfunction and while smart meters and new technologies have decreased the need for estimated readings, it should be noted that technology still has its limitations and errors, resulting in the possible need to estimate bills. In fact, there may be an increase in estimated bills due to the shortened time period to respond to errors and exceptions. Increased workload to address these issues in a shortened timeframe should also be considered.

In relation to the Board's question about a measure specifically for estimated billing, HHHI feels that since estimated billing is already included in the Billing Accuracy standard, no additional measures are required.

Conclusion

In the opinion of HHHI, the cost to implement monthly billing significantly exceeds any value benefit to HHHI's Residential customers and therefore, HHHI does not support the implementation of monthly billing. HHHI feels that Local Distribution Companies should retain the ability to manage their billing processes for the benefit of their customers. HHHI will continue to promote electronic billing, web-portal presentment and conservation programs to assist customers with timely and relevant electricity consumption and cost related data.

Any additional questions or clarifications can be directed towards Tracy Rehberg-Rawlingson, Regulatory Affairs Officer, Halton Hills Hydro Inc., (519) 853-3700 extension 257, tracyr@haltonhillshydro.com.

Respectfully submitted,

(Original signed)

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Halton Hills Hydro Inc.

Cc: Arthur A. Skidmore, President & CEO
David J. Smelsky, CFO