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October 21, 2015

VIA RESS, EMAIL and COURIER

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

**Re: EB-2015-0268 Ontario Energy Board (the “Board”)
*Energy Consumers Protection Act, 2010 (“ECPA”) Notice of Proposal to
Amend a Code and to Amend a Rule***

WRITTEN COMMENTS OF ENBRIDGE GAS DISTRIBUTION INC.

On October 5, 2015 the Ontario Energy Board (the “Board” or “OEB”) issued a notice (“Notice”) with respect to proposed amendments to certain rules and codes under sections 45 and 70.2 of the *Ontario Energy Board Act, 1998* (“OEB Act”) inviting all interested parties to submit written comments on the proposed code and rule amendments by October 21, 2015. What follows constitutes the written comments of Enbridge Gas Distribution Inc. (“Enbridge”) in relation to the proposed amendments. All of Enbridge’s comments relate to the proposed amendments outlined in Section B of the Notice.

Proposed Amendment #2: Making retail contracts more visible on the bill

“The OEB proposes to amend the RSC and the GDAR such that a distributor-consolidated bill issued to a low volume consumer that has a contract with a supplier must include a statement, in capital letters, to the effect that the consumer’s supply is being provided under contract. The OEB also proposes to require distributors to provide for up to 500 text characters for the display of this statement, together with the supplier’s name, telephone number, website, and e-mail address on the bill.”

Enbridge supports this proposed amendment. Enbridge notes that it already provides the supplier’s name and telephone number on the bill for those customers who have elected to purchase gas through a direct purchase arrangement. Enbridge does not currently maintain a database of the additional information – supplier website and e-mail

address- proposed to be included on a direct purchase customer's bill. In addition, Enbridge's Customer Information System ("CIS") does not currently have the functionality to maintain and include this information for billing purposes. Providing the proposed information would require additional changes to the EBT Standards and changes to both CIS and Entrac¹ systems, as well as the interface between the two systems. Additional administrative effort to collect this information from suppliers would also be required. Furthermore, these changes may require additional lines to be added to the bill possibly requiring another page. This would increase paper and postage costs. Enbridge supports addition of a supplier's email address and website, but will require flexibility on how the information is displayed. For example flexibility for font selection and capitalization would ensure consistency with the overall look of the bill.

"The OEB believes that there is merit in considering additional changes to the bill, and more specifically to requiring that the commodity cost based on the contract price and the commodity cost based on the system supply price appear on the bill. However, the OEB is aware that electricity bills in particular are already complex and that additional requirements have recently been prescribed in relation to the Ontario Electricity Support Program and the Debt Retirement Charge. Although amendments to the RSC and the GDAR are therefore not being proposed at this time in relation to the inclusion of both the contract and system supply costs on bill, it would be helpful to the OEB if interested parties could include in their comments made in response to this Notice their thoughts on how the approach might best be implemented with minimal risk of consumer confusion and minimal operational concerns."

Enbridge does not support this proposed amendment. Enbridge believes the addition of system supply pricing to the customer bill will increase customer confusion. It will likely be the case that system gas supply prices and contract prices will differ given different contracting practices of utilities and gas vendors. Enbridge is not aware of the details of the pricing or contracting underpinning the gas supply charge provided by gas vendors for billing purposes. Further, the gas vendor gas supply charge may or may not include transportation costs. Enbridge would therefore not be able to explain any differences between the direct purchase gas supply charge and the system supply charge. Enbridge's system supply charge for each quarter is publicly available on both Enbridge's and the OEB's website. The fact that Enbridge's gas supply charge changes quarterly is another factor that would complicate any direct comparison at a specific point in time to a gas vendor's charge. Enbridge is not privy to the gas vendor's contracting arrangements with customers, suppliers or transporters. Only the gas vendor would have this information, and given the competitive nature of gas marketing, this information is proprietary to the gas vendor. Comparing the system supply commodity charge to a gas vendor supply charge at a specific point in time is likely not

¹ EnTRAC (Energy Transaction Reporting Accounting and Contracting) is an Enbridge application which gas vendors and large volume customers use to manage contract and gas supply and view financial information.

an “apples to apples” comparison. Enbridge also expects that adding the system supply charge to the bill will increase call volumes and customer complaints and disputes with gas vendors causing further customer dissatisfaction. Additionally, if a customer elects to change their supply option they may face early termination costs or difficulty exiting their gas contract. Finally, the OEB’s proposal would also require significant system changes, training and add business rule complexity (for example in exception cases such as supplier switching, pro-rationing) in order to be accommodated.

“The OEB will also consult directly with the Electronic Business Transaction (EBT) Standards Working Group to identify whether any changes are required to the EBT Standards in respect of its current and potential future proposals.”

Should the Board proceed with the amendments proposed in this section of the Notice, additional vendor information (i.e., email & website) would be required. In addition, a change in how the Enbridge bill is presented would also be required. These proposed changes would require a change to the EBT Standards and in particular the implementation guides, the PPG update schemas and Entrac. This would require one or more working group sessions to update the standards, agree on schema changes and an implementation time line.

Proposed Amendment #4: Written notice to consumers of the switch to a supplier

“To promote consumer awareness that their supply arrangements are changing as a consequence of having entered into a contract, the OEB proposes to amend the RSC and the GDAR to require distributors to provide written notice to low volume consumers of the switch to a supplier.

The notice must include certain prescribed information, such as the name of the supplier, the effective date of the switch, and whether the consumer will continue to receive a bill from the distributor. Although the OEB understands that distributor-consolidated billing is pervasive in both the gas and electricity sectors at the present time, this may not always be the case. The OEB believes that this measure will be most effective if sent separate and apart from any other correspondence from the distributor, including the bill. The proposed amendments to the RSC and the GDAR have been drafted accordingly. The OEB intends to prepare a form of letter that distributors may use for purposes of this new notice requirement.”

Enbridge supports this proposed amendment. Enbridge would note that it currently sends a letter to large volume customers in the case of a supplier switch and can accommodate this for all customers. Based on the amendments proposed in Attachment D, Section 4.3.11(c) of the Notice, Enbridge would suggest that the form of letter include the following wording in relation to the timing of the first bill under a new supply arrangement: “Your billing cycle day will remain the same”. Enbridge believes

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this is more appropriate than providing an expected date for the first bill under a new supply arrangement because it would be difficult to predict the actual bill date as billing cycles change monthly. For reference, a sample form of letter based on the letter currently provided by Enbridge is attached. This attachment includes the proposed amendments and Enbridge's suggested wording in relation to timing of first bill under a new supply arrangement. Enbridge requests that the utility be given the flexibility to provide the required letter electronically if future system changes can accommodate this approach. System changes would be required to implement these proposed amendments.

Enbridge is currently making significant changes to Entrac to accommodate the Dawn Access Settlement Agreement. These changes will require a blackout period in 2016. Should the Board implement the proposed amendments related to bill presentation, Enbridge expects the time required to for changes to its processes and systems would likely be longer than six months. Changes to systems and processes related to provision of a letter to customers switching supply contracts are expected to require at least two months. In the event that the Board determines that some or all of the proposed amendments should be implemented, Enbridge will evaluate the cost consequences of doing so.

Please contact the undersigned if you have any questions.

Yours truly,

(Original signed)

Andrew Mandyam
Director, Regulatory Affairs and Financial Performance

Attach.



March 6, 2006

«customer»
«street», «unit»
«City»
«PostalCode»

Dear **Sir/Madam**:

Re: Account Number: «ACCOUNTNUMBER» “NOTICE OF PENDING SWITCH”

Enbridge received a request from «PENDING VENDOR - MSA LEGAL NAME» that you have selected them as your new natural gas supplier effective «ENROL EFFECTIVE DATE».

As per the Ontario Energy Board Gas Distribution Access Rule, you may proceed with one of the following options

- A) Take no action, which will allow the transition to proceed as scheduled
- B) Contact «PENDING VENDOR - MSA LEGAL NAME» to discuss «PENDING VENDOR - MSA LEGAL NAME» sending a request to Enbridge to cancel the above request. Note: «PENDING VENDOR - MSA LEGAL NAME» would need to contact Enbridge prior to «CONTEST PERIOD END DATE» to terminate the above request.
- C) Access the EnTRAC Application prior to «CONTEST PERIOD END DATE» and submit a Status Advise – Terminate Request referencing the Original Transaction Reference Number «TRANSACTION REFERENCE NUMBER SA-NPS» for the Status Advise – Notice of Pending Switch transaction, after you have explored your contractual obligations with «PENDING VENDOR - MSA LEGAL NAME».
- D) Contact Enbridge prior to «CONTEST PERIOD END DATE» to cancel the above request after you have explored your contractual obligations with «PENDING VENDOR - MSA LEGAL NAME».

You will continue to receive your bill from Enbridge Gas Distribution Inc. using distributor consolidated billing, using the contracted rate <<PPG RATE>> provided by your new natural gas supplier «PENDING VENDOR - MSA LEGAL NAME» Your billing cycle day will remain the same.

If you have any questions with respect to this change please contact **<Current Vendor Name>** at **<Current Vendor Phone Number>**.

Sincerely,

Customer Service

Enbridge Gas Distribution Customer Service
1-888-492-5100