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By E-Mail Only

May 25, 2017

To: All Rate-Regulated Natural Gas Distributors

**Re: Review of Customer Service Rules
OEB File No.: EB-2017-0183
Survey of Practices & Invitation to Provide Input**

On May 16, 2017, the Ontario Energy Board (OEB) announced that it will review the customer service rules (CSR) for electricity distributors, rate-regulated natural gas distributors and unit sub-meter providers. As part of this review, the OEB is conducting a survey of rate-regulated natural gas distributors' practices to collect information on a number of important questions relating to the application of the current CSR.

The survey is a key element of the OEB's research into how the CSR have been operationalized by distributors and the types of issues that may have arisen. The following is the link to the survey: <https://www.surveymonkey.com/r/OEB-CSR-NG>. You are required to complete the survey on or before **June 15, 2017**, along with providing all supporting information and relevant documents.

In addition, the OEB wishes to provide you with an opportunity to share your experience with the CSR and whether they are meeting the expectations of your customers, as well as your ideas for improvements. We have provided some suggestions for areas you may wish to cover in your comments at Attachment 1. However, we welcome comments on all aspects of the CSR. Your written comments will assist OEB staff in furthering its work on the CSR review including developing options and recommendations. You may wish to comment individually, as groups and/or through associations. Comments should be forwarded by e-mail to CSR@oeb.ca no later than **June 22, 2017**.

If you have any questions regarding this initiative, please contact Gona Jaff, Project Advisor at 416-440-7613 or CSR@oeb.ca.

Yours truly,

Original Signed by
Brian Hewson
Vice President, Consumer Protection & Industry Performance

Attachment 1

Letter to All Rate-Regulated Natural Gas Distributors Review of Customer Service Rules OEB File No.: EB-2017-0183

SUGGESTED AREAS FOR COMMENTS

The following are some suggested areas for comments. As indicated, we are looking for information in terms of the expectations your customers are looking for in regards to the CSR and any operational impacts related to the implementation and possible changes in the rules. Please feel free to provide comments and/or recommendations in relation to areas that are not covered by the questions and statements below.

BILLING AND PAYMENTS

1. In terms of billing and payment options, have your customers shown an interest in greater options and choice such as (a) being provided with a choice of two bill payment due dates within a month; (b) being provided with the option of electronic (paperless) billing; (c) accepting other forms of payment such as credit cards?
2. How would providing residential customers with a choice of two or more bill payment due dates within a month affect the distributor's systems and operations?
3. What are the operational implications of accepting credit card payments for the distributor?
4. Does the length of allowed payment period following the issuance of an invoice (current period is 16 days) affect the distributor's operations?

ALLOCATION OF PAYMENTS

5. With respect to distributors billing for 3rd party services, are there any reasons for partial payments to be allocated in accordance with customer requests?
6. What would be the implications for distributor systems and operations of allocating partial payments in accordance with customer requests?

EQUAL MONTHLY PAYMENT AND EQUAL BILLING PLANS

7. What are the implications of offering equal billing/equal monthly payment option to:
 - a. All residential customers including those enrolled with gas marketers
 - b. All small business customers

DISCONNECTIONS FOR NON-PAYMENT

8. Should the notice period be longer than 10 calendar days before disconnecting a residential or a small business customer for non-payment reasons?
9. Whether and if so, to what extent and under what circumstances residential and small business customers be protected from disconnection for non-payment during winter months?
10. Whether and if so, to what extent and under what circumstances charges relating to non-payment of accounts (e.g. collection, disconnection, and reconnection) should be waived for customers who are unable to pay their bills and facing disconnections?

ARREARS PAYMENT AGREEMENTS (APA)

11. Electricity distributors are required to offer residential customers an APA that at least meets the terms of the APA set out in the Distribution System Code (DSC). As a natural gas distributor, what are your thoughts on the current DSC prescribed terms? What improvements can be made to those terms including required down payment, length of repayment period, inclusion/exclusion of late payment charges, number of defaults allowed before cancelling the APA, etc.?
12. Whether and if so, under what terms APAs should be offered to small business customers unable to pay their bills?

SECURITY DEPOSITS

13. What are your thoughts on the DSC prescribed security deposit rules for electricity distributors? What changes, if any, do you recommend to those rules?

ADDITIONAL COMMENTS

14. Are there any other comments and/or recommendations for consideration? If yes, please provide them under the heading "Additional Comments".