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VIA RESS, EMAIL and COURIER

February 14, 2019

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

**Re: Review of Customer Service Rules
Ontario Energy Board (the "Board") File No.: EB-2017-0183
Comments of Enbridge Gas Inc. ("Enbridge Gas")**

In accordance with the Board's Letter dated January 17, 2019, enclosed please find comments of Enbridge Gas regarding Phase 2 of the Board's review of customer service rules.

Please contact the undersigned if you have any questions.

Sincerely,

(Original Signed)

Bonnie Jean Adams
Regulatory Coordinator

Encl:

Comments of Enbridge Gas Inc.

regarding

**Phase 2 of the Ontario Energy Board's Review of
Customer Service Rules**

EB-2017-0183

February 14, 2019

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Introduction

On October 25, 2018 the Ontario Energy Board (the “Board”) announced the initiation of Phase 2 of its Review of Customer Service Rules (“CSR”) for electricity distributors, rate-regulated natural gas distributors and unit sub-meter providers. On January 17, 2019, the Board invited gas distributors by letter to complete a survey on or before February 7, 2019. Enbridge Gas Inc. (“Enbridge Gas”) has responded to the survey online. In addition to the Survey, the Board invited natural gas distributors to submit written comments regarding their experience with the CSR, including whether the rules are meeting the expectations of customers, and to provide ideas for improvement.

Enbridge Gas assigns a high priority to providing a superior customer experience both efficiently and effectively. It is the view of Enbridge Gas that this objective is best facilitated by a high-level, principle-based regulatory construct which recognizes that no one company or regulator can predict the full range of possible customer experiences, and one size does not fit all. Prescriptive or overly complex customer service rules will not provide the flexibility that gas distributors require to adapt to market changes and respond to the needs of their customers. In contemplating the implementation of additional rules via Gas Distribution Access Rule (“GDAR”) amendment, Enbridge Gas urges the Board to focus on outcomes and respect the utility’s ideal position to effectively respond to the needs of its customers.

In accordance with the specified scope of Phase 2 of the Board’s Review of CSR this written submission will address the following areas: 1) Billing Errors, 2) Opening and Closing of Accounts, 3) Service Charges Related to the Management of Customer Accounts, and 4) Additional Comments.

Billing Errors

1. ***Do you have any views on the current two-year maximum periods for correction of billing errors? Would increasing or decreasing these periods impact the distributor's operations? If so, how?***

Enbridge Gas believes the current two-year maximum period for correcting billing errors strikes an appropriate balance, providing protection for ratepayers and utilities in the rare instances an error occurs.

Increasing or decreasing the maximum period would impact Enbridge Gas operations. Potential impacts of increasing or decreasing the maximum period may include, but are not necessarily limited to:

1. Change in the storage requirements for customer data;
2. Modification of processes and re-training of employees and contractors; and,
3. Impacts to Enbridge Gas's customer information systems.

2. ***Are there any operational challenges associated with settling billing errors? If so, what are they? Are there different challenges associated with residential and non-residential low-volume consumers?***

There are no operational challenges associated with settling billing errors.

3. ***Do you have any views on payment methods for settlement of billing errors? What are the operational implications associated with the payment options your customers have requested?***

In Enbridge Gas's view there need not be prescriptive rules regarding the payment methods used to settle billing errors, as such rules may unduly restrict the utility from leveraging more effective payment methods in the future that may not be in use today. Ultimately whether to receive payment via bill credit, cheque or another payment method should be at the discretion and initiative of the customer.

Some of the operational implications associated with the payment options Enbridge Gas customers have requested include:

- Issuance of a bill credit is the most cost effective method for settling billing errors. This approach results in an immediate resolution to the billing error, with little to no follow-up required.
- Relative to a bill credit, cheques require substantially more of a customer service representative's time. Further, customers may be required to wait up to 30-45 days from

the date on which they request the cheque before receiving it in the mail. Other operational implications associated with the use of cheques include, but are not necessarily limited to the use of additional customer service representatives' time to handle follow-up requests, as well as any additional costs required to re-issue the cheque if needed.

- The use of pre-authorized deposit functionality and email money transfers are other low cost options which can be processed within 5 days.

Opening and Closing of Accounts

4. Have you encountered any challenges when confirming a customer's identity and authority to open or close an account?

Yes. In some cases customers that have been disconnected for non-payment of their account have tried to arrange for their gas services to be reconnected using fraudulent means, such as using the name of one of their children or a relative without their knowledge to open a new account.

Enbridge Gas is continuously evaluating opportunities to improve its processes to address issues such as the one identified above. One process change currently under consideration is requiring customers with poor payment history to provide proof of identification. Enbridge Gas requests that any additional customer service rules created by the Board within EB-2017-0183 not restrict gas distributors from implementing this process.

5. Have you encountered any landlord/tenant issues impacting the opening and closing of accounts?

Yes, specifically:

1. In some cases tenants who have been disconnected for non-payment of their account have tried to arrange for their gas services to be reconnected using fraudulent means, such as using the name of one of their children or a relative without their knowledge to open a new account.
2. In instances where there is no agreement in place with the landlord it can prove challenging to determine who the landlord is when the tenant moves out.
3. Landlords themselves may have arrears or bad debt associated with other accounts in addition to any arrears or bad debt potentially accrued by a tenant.

In order to address some of the issues identified above Enbridge Gas is considering requiring all landlords to enter into landlord agreements which ensure their responsibility for either payment of amounts accrued between tenant occupancy or the payment of a disconnection fee. Though Enbridge Gas has yet to render a decision regarding this policy, Enbridge Gas requests that any additional customer service rules created by the Board within EB-2017-0183 not restrict gas distributors from applying such a policy.

6. *Are there any reasons why a distributor may continue to provide service to a rental property after the tenant who is the account holder has moved out and there is no agreement in place for continued service? How do you treat any charges that were incurred during the period when there was no agreement in place?*

Yes. Continuing service allows time for a new customer to contact Enbridge Gas for service, as it is most often the case that a customer is living in the premises and has yet to contact Enbridge Gas. Allowing time to establish contact limits the cost of unnecessary disconnections and reconnections. These unnecessary disconnections are also highly likely to leave new customers with a negative impression of Enbridge Gas.

New customers are required to inform Enbridge Gas of the date on which they took possession of or moved into the property. Enbridge Gas subsequently determines if the date aligns with the previous customer's move out date. The new customer will only incur charges from the date on which they took possession of or moved into the property.

Service Charges Related To Management of Customer Accounts

7. *What are the costs associated with setting up a new account? Are there similar costs associated with transferring a customer's account to a spouse or partner?*

Costs associated with setting up a new account may include, but are not necessarily limited to labour costs spent to process the request and manage customer inquiries, ongoing maintenance of meters, as well as a portion of the costs associated with Enbridge Gas's customer information systems and facilities costs. When setting up a new account Enbridge Gas collects approved new account service charges and account transfer charges of \$35.00 within the Union rate zone and \$25.00 within the EGD rate zone. While the process of transferring an account is effectively the same process as establishing a new account, Enbridge Gas does not collect new account or transfer charges when transferring a customer's account to a spouse or partner.

8. Are there any reasons for applying a charge to test a meter before a decision on a billing dispute is made? What are the operational impacts if this fee is only applied after a decision is made?

Enbridge Gas believes its current practice of charging a fee to test a meter after a decision on a billing dispute has been rendered is effective. While pre-emptively charging to test a meter could in theory decrease the number of meter tests requested, in Enbridge Gas's experience requiring payment of a charge retroactively in the event the meter is found to be in good working order provides a sufficient deterrent to meritless requests.

Additional Comments

9. Are there any other comments and/or recommendations you would like to add? If yes, please provide them under the heading, "Additional Comments."

As emphasized in Enbridge Gas's submissions in Phase 1 of EB-2017-0183 Enbridge Gas hopes to limit the complexity and prescriptive nature of any new customer service rules applied via GDAR amendment.¹ While Enbridge Gas shares the Board's desire to protect customers, in Enbridge Gas's experience it is highly challenging to foresee the full range of possible customer interactions and outcomes. As a result, simple, principle-based rules are likely to be more effective in providing utilities the flexibility to work with customers to meet their needs as they arise. Complex or prescriptive rules on the other hand bear the risk of increased administrative costs and a poorer customer experience.

In considering whether or not additional customer service rules are required Enbridge Gas urges the Board to consider whether the areas being addressed are currently the subject of sub-optimal customer service. With respect to billing errors for example, over the past two years Enbridge Gas has averaged only approximately 5,250 meter exchange work orders related to stopped meters, representing a mere 0.15% of all customer meters maintained by Enbridge Gas. Furthermore, Enbridge Gas's meters are managed through a well-established program detailing the performance testing, repair, and replacement requirements of meters and instruments. All verified meters are approved by Measurement Canada and Enbridge Gas is accredited by Measurement Canada as an Authorized Service Provider adhering to *Measurement Canada Accreditation Standard S-A-01*². Enbridge Gas submits that an area such as this, in which Enbridge Gas has demonstrated strong performance and is subject to the jurisdiction of a federal government agency, is not an appropriate target for additional layers of rules and process. Enbridge Gas urges the Board to limit costs and maximize utility efficiency by withholding from implementing additional customer service rules in instances where no significant issues or concerns have been identified.

¹ EB-2017-0183 Enbridge Gas Comments, January 18, 2019.

² EB-2018-0305, Exhibit C1, Tab 2, Schedule 1, p.263