



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

July 11, 2019

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Toronto, ON

Dear Ms. Walli:

**Re: EB-2018-0319 Enbridge Gas Distribution Inc.
Application for approval to continue the existing financial terms associated with
offering Open Bill Access services for the years 2019 and 2020
Request for Intervention and eligibility for cost awards**

VECC is seeking late intervention status in the above noted proceeding. We had not previously intervened in this proceeding as it was thought at the time of filing of the application in late 2018 that the issues were limited to the financial terms of the current Enbridge agreement for third party billing access.

Our interest at this time is related to the terms under which a customer may be denied natural gas service where less than full payment has been made on a bill having multiple service charges.

By way of an interrogatory response (Exhibit I. EGI.BOMA.6 February 8, 2019) we became aware that the current Access Agreement contains the following term:

Move Out arising out of Non-Payment

For both gas and non-gas accounts, if a customer does not pay its Service Bill in full, EGD will move out the customer in accordance with its customary billing procedures. For the 30 day period immediately after a customer's meter is disconnected for non-payment, no information on the disconnection will be sent to the Biller. If no payment or arrangements to pay have been made by the customer with EGD within the 30 day period, the EGD contract account will be red locked/customer moved out and the account will be finalized. The finalizing of the account will be reported to the Biller on the CIS-generated Moves Report with a TOS code RC02. (TOS codes are discussed in more detail in the section below.) The remaining balance on Loans and Standing Requests will not be billed out on the final Service Bill presented under the OBA Service. The Biller is responsible for determining the unbilled amount and invoicing its Customer through

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another means. Rental charges on the final Service Bill will be prorated based on the move out date. The account is finalized and EGD ceases to bill the customer for gas and non-gas charges. A move in will be performed once payment arrangements have been made or when a new customer moves in. If the original customer moves back in then the rental(s) will be back billed to the move out date.

The intent of this provision appears to allow or require EGD to disconnect a customer from natural gas service in the case where the customer makes a payment at, or in excess of the amount owed to the regulated utility for natural gas service but less than that required for payment in full for third-party ancillary and non-regulated services invoiced on the same bill.

VECC would like to understand better the purported circumstances under which a customer might be disconnected for non-payment of a non-regulated service offered by a third party. It is not clear to us what authority is relied upon by the regulated utility or, if it is the case, the Ontario Energy Board, to enforce a private contract through the regulated service offering.

We understand that by the lateness of our request VECC would be required to participate in the upcoming settlement conference on the basis of the record as it stands. We respectfully ask that the Board allow us full participation in the remainder of this proceeding and that eligibility be granted for any reasonably incurred costs. We have listed our contact information below

Yours truly,

John Lawford

Counsel for VECC

Email:

Mr. Joel Denomy, Technical Manager, Regulatory Initiatives
Ms. Lorraine Chiasson, Assistant Regulatory Coordinator
EGDRegulatoryProceedings@enbridge.com

ONTARIO ENERGY BOARD

ENBRIDGE GAS DISTRIBUTION INC.
OPEN BILL ACCESS SERVICES
EB-2018-0319

NOTICE OF INTERVENTION
OF THE
VULNERABLE ENERGY CONSUMERS COALITION

To: Ms. Kirsten Walli, Board Secretary

And to: **Mr. Joel Denomy, Technical Manager, Regulatory Initiatives**

IDENTITY OF THE INTERVENOR AND ITS MEMBERSHIP

1. The Vulnerable Energy Consumers Coalition (VECC) hereby expresses its intention to intervene and participate in the above-mentioned proceeding. VECC consists of the following organizations:
 - (a) The Federation of Metro Tenants Association (FTMA)
 - (b) The Ontario Coalition of Senior Citizens' Organizations (OCSCO)
2. The Federation of the Metro Tenants Association (the "FTMA") is a non-profit corporation composed of over ninety-two affiliated tenants associations, individual tenants, housing organizations, and members of non-profit housing co-ops. In addition to encouraging the organization of tenants and the promotion of decent and affordable housing, the Federation provides general information, advice, and assistance to tenants. The address is:

500-27 Carlton Street
Toronto, ON
M5B 1L2
3. The Ontario Coalition of Senior Citizens' Organizations ("OCSCO") is a coalition of over 160 senior groups as well as individual members across Ontario. OCSCO represents the concerns of over 500,000 senior citizens through its group and individual members. OCSCO's mission is to improve the quality of life for Ontario's seniors. OCSCO's address is:

333 Wilson Avenue, Suite 406
Toronto, ON
M3H 1T2
4. The coalition of the FMTA and OCSCO under the name VECC has the specific mandate of intervening in proceedings to advocate on behalf of the interests of Ontario's vulnerable

consumers with respect to energy issues, primarily through intervention in regulatory proceedings at the Ontario Energy Board.

5. Although the organization is not itself a member of VECC, the Public Interest Advocacy Centre (PIAC) in Ottawa assists in the representation of the interests of vulnerable consumers by ensuring the availability of competent representation and consultant support to the VECC participation.
6. VECC is a frequent intervenor in Board proceedings. Our annual information filing can be found on the Board's website at:
http://ontarioenergyboard.ca/oeb_Documents/Intervenor_Filings/VECC_2014_annual_intervenor_filing20140605.pdf

INDIVIDUALS AUTHORIZED TO REPRESENT VECC IN THIS PROCEEDING

7. The name & address of the agent authorized to receive documents on behalf of VECC is:

John Lawford
Counsel, Regulatory and Public Policy
2-285 McLeod Street,
Ottawa, Ontario
K2P 1A1
613-562-4002
lawford@piac.ca

PIAC Office: 613-562-4002 (Donna Brady) Ext. 21

8. VECC requests that all correspondence and documentation also be electronically copied to VECC's consultants:

Mark Garner (project manager)
647 Broadway Ave.
Toronto, Ontario
M4G 2S8
647-408-4501 (office)
markgarner@rogers.com

9. To mitigate costs VECC requests only electronic copies of the materials. VECC may request paper copies of some or all of the materials should this become necessary. VECC requests electronic copies of the application and any additional supporting materials are sent to Mr. Harper and Mr. Garner at their respective e-mail addresses.