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BY COURIER & RESS

Ms. Kirsten Walli, Board Secretary
ONTARIO ENERGY BOARD
2300 Yonge Street, 26th Floor, P.O. Box 2319
TORONTO, ON M4P 1E4

Re: Board File No. EB-2017-0183
KWHI Application for Exemption from Customer Service Rules

Dear Ms. Walli:

As part of its 2020 Cost of Service rate application (EB-2019-0049), KWHI discussed in depth the upcoming replacement of its Customer Information System (CIS) from a COBOL based in-house application to an Oracle Customer Care and Billing (CC&B) system. This \$8M project, commencing in the fall of 2019 with a December 2020 expected go-live date, is a large company-wide project consuming many of KWHI's labour resources for the duration of the project as well as for approximately three months following the go-live date.

On March 14, 2019, the Ontario Energy Board ("OEB" or the "Board") issued amendments to the Distribution System Code (DSC) and Standard Supply Service Code (SSSC). A number of these amendments are scheduled to become effective March 1, 2020. KWHI is requesting a temporary exemption from some of the amendments. The specific sections are detailed below:

DSC:

- Section 2.4.9 – Returning a security deposits to customers in the GS<50 kW rate class after three (3) years of good payment history (currently five (5)).
- Section 2.4.9A – "Before requiring a security deposit under section 2.4.9 from a residential customer... a distributor shall offer the customer the option of enrolling in an equal monthly payment plan in accordance with the Standard Supply System Code, a preauthorized payment plan, or both, and where the customer elects to enroll, no security deposit shall be required."
- Section 2.7.1 – Offering arrears payment agreements to small business customers "A distributor shall make available to any residential or GS<50 kW customer..."
- Section 4.2.4 – At least seven days before issuing a disconnection notice for non-payment, a distributor shall deliver an account overdue notice to the customer.
- Section 4.2.5d – "A distributor shall not disconnect a customer for non-payment on a day the distributor is closed to the public to make payment and/or reconnection arrangements or on the day preceding that day."



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- SSSC:
- Amended section 2.6.2 and revoked sections 2.6.2B and 2.6.2C. eliminating equal billing plans in lieu of equal payment plans.

To comply with these regulation changes, KWHI estimates a minimum of twelve to fifteen weeks of work is required to develop, test, train, communicate and deploy new programs in its current customer information system (CIS). KWHI's existing CIS is many decades old and written in COBOL – a programming language that is becoming harder and harder to find expertise in. One of the key drivers that has led to its replacement is the duration of time required to make significant changes because of the lack of flexibility built in to its original design.

The same resources required to accomplish tasks related to the changes stemming from the revised Customer Service Rules are dedicated to implementing the new CIS - Oracle Customer Care and Billing (CC&B). The diversion of staff from the implementation team will cause difficulties for the implementation and completion of this project.

KWHI notes that any additional programming to its existing CIS will be of no value once it transitions to the Oracle CC&B billing system. KWHI further submits the duplication of effort between the two CIS systems would increase costs and, thus, it is not in KWHI's customers' best interests to do so.

KWHI respectfully requests an exemption from these new regulations starting March 1, 2020 until April 1, 2021 following hyper-care post-go live. In the interim period, KWHI will make its best efforts to abide by the intent of these regulations with internal procedures in place of modified programming in its CIS.

Questions or concerns in this matter should be addressed to the undersigned.

Respectfully submitted,

Original Signed By

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