

**BY E-MAIL**

December 3, 2019

Christine E. Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto ON M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)  
2019 Open Bill Access Application  
Ontario Energy Board (OEB) File No. EB-2018-0319**

In accordance with Decision and Procedural Order No. 8, please find attached OEB staff's interrogatories in the above noted proceeding. Enbridge Gas and all intervenors have been copied on this filing.

Enbridge Gas's responses to interrogatories are due by December 17, 2019.

Yours truly,

*Original Signed By*

Donald Lau  
Project Advisor – Electricity Distribution: Major Rate Applications & Consolidations

Encl.

**OEB Staff Interrogatories**  
**Application for Open Bill Access (OBA) Services**  
**Enbridge Gas Inc. (Enbridge Gas)**  
**EB-2018-0319**  
**December 3, 2019**

**3-Staff-1**

**Biller User Manual**

**Ref: EB-2018-0319 Supplementary Evidence – Exhibit B – Tab 2 – Schedule 2 – Table 1**

**Ref: EB-2018-0319 Supplementary Evidence Attachment 2, p. 2**

Enbridge Gas provided in Table 1 the total number of disputes per year. The Biller User Manual contemplated three scenarios where a Customer Billing Dispute (CBD) can be deemed “closed”. The Biller may close the CBD if the Biller has resolved the dispute with the customer; or the Biller has advised the customer that the Biller will remove the charge from the OBA service; or the CBD has not been resolved by the specified timeline.

- a) Please breakdown the total number of disputes in Table 1 to the three scenarios where the CBD can be closed.
- b) Please breakdown in each of the three scenarios if the CBD was classified under the Consumer Protection Act (CPA) or non-CPA.
- c) For the breakdown where the Biller has resolved the dispute with the customer please provide a further breakdown of the number of reinstated disputes. If there are multiple reinstated disputes for the same CBD, please show the number of times the reinstated dispute reoccurred
- d) Please explain what evidence is required from the Biller to prove that the dispute has been resolved with the customer.
- e) Is there a limited number of times a dispute can be reinstated before Enbridge Gas closes the CBD?
- f) Of the total number of bills provided in Table 1, please provide the number of times Enbridge Gas disconnected a customer as a result of an unresolved dispute.
- g) Of the total number of bills provided in Table 1, please provide the number of times Enbridge Gas disconnected a customer as a result of arrears that included non-payment of OBA charges.
- h) Please add in Table 1 the number of customers billed under the OBA program for each year.

### **3-Staff-2**

#### **Previously Disputed Charges**

**Ref: EB-2018-0319 Supplementary Evidence Attachment 2, p. 4**

The Biller User Manual states that “Enbridge Gas reserves the right to delete Rate Ready transactions, block Bill Ready transactions, and to credit and reverse all billings of charges associated with, relating to or arising out of CBDs unless the Customer has agreed to the resolution and rebilling of such charges.”

- a) Please provide the number of instances, by year, where Enbridge Gas deleted Rate Ready transactions, blocked Bill Ready transactions, or credited and reversed all billings of charges associated with, related to or arose out of CBDs.
- b) Please provide the number of CBDs that were related to Rate Ready transactions, block Bill Ready transactions, and credit and reversal of all billings of charges and for each one, provide the number of CBDs that resulted in the customer’s favor.

### **3-Staff-3**

#### **Historical Disputes**

**Ref: EB-2018-0319 Supplementary Evidence – Exhibit B – Tab 2 – Schedule 2 – Table 1**

**Ref: EB-2018-0319 Supplementary Evidence Attachment 3, pp. 2-5**

Enbridge Gas provided in Table 1 the total number of disputes per year and the total number of bills per year. In Attachment 3, the total number of disputes are broken down by bill type code.

- a) Please provide a breakdown of the total number of bills with the same bill type code.
- b) For each bill type code, please express, as a percentage, the total number of disputes compared to the total bills.
- c) There is a significant increase in number of disputes for Rental Adjustments in 2018 compared to 2017, even though the number of transactions decreased significantly. Please provide an explanation.
- d) Enbridge Gas stated in Attachment 3 that it investigates whether the Biller has complied with its obligations under the OBA Agreement. Please provide by year and bill type code, the number of times Enbridge Gas has started an investigation and a further breakdown as to whether or not the charge was removed as a result of the investigation.

- e) Please provide the number of Billers Enbridge Gas has removed from the OBA program as a result of the Biller not meeting its OBA obligations.

### **3-Staff-4**

#### **Rental Buyouts**

**Ref: EB-2018-0319 Supplementary Evidence – Exhibit B – Tab 2 – Schedule 3**

Enbridge Gas provided several breakdowns of disputes related to rental buyouts and other post contact items in the reference above.

- a) Please provide a detailed description of the each bill code.
- b) The number of rental adjustments spiked significantly in 2017. Please provide an explanation for the spike in comparison to other years.
- c) Over five years, the number of Rental Buyout transactions increased by 133%, while the total dollar amount increased by 340%. This implies that the average Rental Buyout charges has increased by 250%. Can Enbridge Gas confirm on average this is the case or provide an explanation for the cause?

### **3-Staff-5**

#### **Changes requested by the customer**

**Ref: Retail Settlement Code, Revised on January 1, 2017, Section 10**

In the Retail Settlement Code, a customer can submit a Service Transaction Request (STR) to move between a Competitive Retailer and the Standard Supply Service. The process for the request is that the STR will be processed after ten days unless written authorization to cancel the STR is received from the customer.

- a) Please comment on whether a similar process can be implemented to the OBA program when a customer requests the addition, removal and reinstatement of third party charges.