

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, as amended;

**AND IN THE MATTER OF** an Application by Enbridge Gas Distribution Inc. for an order or orders approving its proposal for open billing services.

**AND IN THE MATTER OF** an Application by Enbridge Gas Distribution Inc. for an order or orders amending or varying the rates charges to customers for the sale, distribution, transmission and storage of gas commencing as of January 1, 2019

**THIRD ROUND INTERROGATORIES**

**FROM THE**

**HVAC COALITION**

*(numbering continues from second round)*

30. [Ex. B/2/1, p. 1] Please advise the position of Enbridge with respect to each of the two unsettled items. If Enbridge has no position, please advise. If Enbridge supports a particular position, please explain the rationale behind that position.
31. [B/2/2, p. 1] Please confirm that all charges by third parties on the Enbridge bill are initiated by Billers, and that Enbridge takes instructions solely from Billers with respect to adding, removing, or modifying such charges.
32. [B/2/2, p. 2] Please advise the number of disputes in each of 2014 through 2018 in which the “outcome” was each of (i), (ii), or (iii). If any disputes were not in any of those three categories, please explain both quantitatively and qualitatively.
33. [B/2/2, p. 2] Please confirm that there is no stated limit to the number of times a customer has to call in again if a Biller continues to advise Enbridge that a dispute has been resolved in favour of the Biller.
34. [B/2/2, p. 3] Please restate Table 1 replacing the line “Total Number of Bills” with the metric “Total Customers with OBA charges on their bills”.

35. [B/2/2, Attach. 2, p. 1] Please advise what percentage of equipment rentals (as opposed to installment sales or other purchases) use the Loan Functionality.
36. [B/2/2, Attach 2, p. 1] Please confirm that different Billers sometimes use different Bill Type Codes for the same type of charges. Please describe all changes to Enbridge's procedures in the last two years to improve consistency of use of the Bill Type Codes.
37. [B/2/2, Attach 2, p. 2] Please advise, from the time a customer calls and initiates a dispute, how many times and under what circumstances does Enbridge have contact with a) the customer, and b) the Biller until the matter is resolved.
38. [B/2/2, Attach 2, p. 4] Please estimate, with supporting information, how much Enbridge would save if it did not have to manage disputes in accordance with the process described in this schematic and this attachment, i.e. if Enbridge simply accepted customer instructions and took no further role.
39. [B/2/2, Attach 2, p. 4] Please describe what steps, if any, Enbridge takes to ensure that Biller communications with respect to resolution of customer disputes actually reflect the wishes of the customer.
40. [B/2/2, Attach 2, p. 5] Please confirm that a customer will only receive the message shown on this page if they have called Enbridge to initiate a dispute (or, since July 2019, interacts online with Enbridge to initiate a dispute).
41. [B/2/2, Attach 2, p. 6] Please provide whatever information Enbridge has (quantitative and qualitative) on complaints by customers that Enbridge is not on their side when it comes to disputes with Billers.
42. [B/2/2, Attach 3, p. 2-5] With respect to the Bill Type Codes:
  - a. Please describe the differences between 0013, 0051, and 0052. Please confirm that 28,694 disputes (22%) over the last five years related to these three water heater categories.
  - b. Please describe the differences between 0076, 0084, 0106, and 0107. Please confirm that 42,644 disputes (31%) over the last five years related to these four maintenance plan categories.
43. [B/2/2, Attach 3, p. 5] Please explain in detail how Enbridge investigates whether Billers have breached their obligations under the OBA Agreement.
44. [B/2/3, p. 3] Please explain why code 130 had such a significant increase in 2017. What steps does Enbridge take when anomalies such as this one become evident in Enbridge's data to determine the cause of the anomaly?
45. [B/2/3, p. 3] Please provide all information in the possession of Enbridge relating to the increase in the dollar amount of code 128, Rental Buyout, from \$3.5 million to \$11.9 million from 2014 to 2018.

46. [B/2/3, p. 3] Please restate Table 4 replace the lien “Total Number of OBA Bills” with Total Number of Rental Contracts”.

Respectfully submitted on behalf of the HVAC Coalition this December 3, 2019.

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Counsel for the HVAC Coalition