

1. Temporary exemption from section 2.4.9 of the Distribution System Code:

- a) Estimate the number of customers in the GS<50 kW rate class that can be potentially affected by KWHI being temporary exempted from this section of the DSC.

*Monthly KWHI runs a report of all customers who are eligible to have their deposits refunded using the current parameters. This report would need to be re-programmed to use 3 years instead of 5 years for the GS<50 class. There are currently 2,500 GS<50 customers who have a deposit with KWHI.*

- b) What are the implications of meeting the requirements through a manual process when requested by the customer?

*There are no implications as all deposit refunds are manual, therefore KWHI can make its best efforts to abide with the intent of the code changes.*

2. Temporary exemption from section 2.4.9A of the Distribution System Code:

- a) According to KWHI's website, KWHI currently offers an equal monthly payment option plan and preauthorized withdrawals to its customers. Based on the current offerings of both plans, please confirm if it is feasible to temporarily use a manual process to support these offerings as opposed to an exemption from section 2.4.9A.

*KWHI offers an equal billing plan and a pre-authorized withdrawal plan. KWHI does not offer an equal monthly payment option plan. KWHI can offer an equal billing plan and/or a pre-authorized withdrawal and waive the deposit requirement through a manual process.*

3. Temporary exemption from section 2.7.1 of the Distribution System Code:

- a) As it is not clear from the application, explain whether the temporary exemption being sought is only with respect to the arrears payment options to be offered to consumers in GS<50 kW rate class or is it a temporary exemption from the amended section 2.7.1 in its entirety.

*Currently KWHI only offers arrears management program to its Residential customers. In order to offer it to a GS<50 customer requires a small programming change.*

- b) Would a manual process where a customer requests the arrears payment options be possible as a temporary measure? Please provide details with your answer.

*A manual process is not an option. Programming must be changed. KWHI can manage this process without an exemption.*

4. Temporary exemption from section 4.2.4 of the Distribution System Code:

- a) Please confirm that KWHI currently issues account overdue notices to its customers.

*KWHI issues account overdue notices to its customers 4 days before a disconnection notice is hand delivered.*

- b) Would it be feasible to use a manual process to produce the account overdue notice as a temporary measure? Please provide details with your answer.

*No. There are approximately 300 notices issued a day.*

5. Temporary exemption from section 4.2.5d of the Distribution System Code:

- a) Please provide specific reasons for requesting an exemption from section 4.2.5d of the DSC and explain how this DSC requirement is related to your CC&B system issue.

*KWHI originally requested an exemption from section 4.2.5d of the DSC as its current CIS system disconnects the day before KWHI is closed to the public. CC&B will be programmed to not disconnect on this date.*

- b) Would it be possible to accomplish this requirement manually?

*Yes, it is possible for KWHI to manually stop disconnections on days KWHI is closed to the public or on the day preceding that day.*

6. Temporary exemption from amended section 2.6.2 of the Standard Supply Service Code:

- a) Please confirm that KWHI currently offers an equal monthly payment plan option to its customers.

*KWHI offers an equal billing plan, not an equal monthly payment plan.*

- b) Provide specific reasons for requesting an exemption from section 2.6.2 of the SSSC and advise if it would be feasible to accomplish this manually.

*No, it is not feasible to offer a monthly billing plan to its customers manually. There are approximately 5,000 customers on KWHI's equal billing plan.*

*Specific reasons for requesting this exemption include:*

- *Programming will take at least 4 weeks of development*
- *Testing and training and reconciling current customers and re-establishing them on a new plan will take another 16 weeks*
- *As mentioned in the exemption request, there are limited resources available to program the existing CIS and the changes will be of no value once transition is complete*

#### 7. Requested Temporary Exemption Period:

In its application, KWHI requested an exemption period to be from March 1, 2020 to April 1, 2021. KWHI identified December 2020 as an expected go-live date for the new CC&B system.

- a) Does KWHI expect the new CC&B system to incorporate all amended DSC and SSSC requirements before it goes live in December 2020?

*The new CIS system (CC&B) is being designed to incorporate all the amended DSC and SSSC requirements.*

- b) If "yes" to question a), explain why KWHI requested exemption beyond December 2020.

*The exemption request was for beyond December 2020 in case of unforeseen delays in implementation. If implementation of the CC&B is on time, no exemption will be required beyond December 2020.*

- c) If "no" to question a), provide reasons for not implementing all amended DSC and SSSC requirements.

*N/A*