

EB-2018-0319
ENBRIDGE OPEN BILL

COMPENDIUM OF MATERIALS
HVAC COALITION

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Biller User Manual

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

EB-2018-0319 Supplementary Evidence Attachment 2, p. 2

Question(s):

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.

Response

Please see the response to Summit interrogatory #2.

- a) Enbridge Gas does not track the information in the categories requested. The high level outcomes set out at Exhibit 2, Tab 2, Schedule 2, page 2 are tracked in the following way: High level outcomes i. and iii. are tracked together. Enbridge Gas does not differentiate between the Biller resolving a bill or the customer agreeing to the charges on the bill.

	2014	2015	2016	2017	2018	2019 (Jan-Sep)
Resolved By Biller or Customer	25,458	26,509	24,606	22,407	21,520	18,039
No Resolution – Charge Removed From Bill	2,214	4,635	2,205	3,044	5,159	1,232
Total	27,672	31,144	26,811	25,451	26,679	19,271

- b) Enbridge Gas' system did not expressly track disputes as "CPA" or Non-CPA" prior to May 21, 2019. All dispute cases were created as CPA and the back office team reviewed each dispute case and updated the due date as necessary. The table below shows the number of disputes with a resolution time limit equivalent to 15 days for CPA disputes and those with a time limit equivalent to the 45 days for Non-CPA disputes.

	2014	2015	2016	2017	2018	2019 (Jan-Sep)
CPA	1,956	1,882	1,698	1,642	3,059	3,884
Non-CPA	25,716	29,262	25,113	23,809	23,620	15,387
Total	27,672	31,144	26,811	25,451	26,679	19,271

- c) Please see the table below.

	2014	2015	2016	2017	2018	2019 (Jan-Sep)
Resolved By Biller or Customer	25,458	26,509	24,606	22,407	21,520	18,039
Dispute Reinstated Once	1,936	1,774	2,174	2,547	3,013	1,679
Dispute Reinstated Twice	132	165	105	182	317	173

- d) No evidence is required from a Biller to prove that the dispute has been resolved with the customer.
- e) When a dispute is reinstated for a second time Enbridge Gas removes the charge, blocks the billing of the product and credits the disputed charges.
- f) See response to part (g) below. A customer will not be disconnected due to an unresolved dispute for OBA charges. Enbridge Gas is not aware of any instance where a customer has been disconnected due to an unresolved dispute.
- g) Enbridge Gas will only disconnect a customer where that customer is in arrears on gas charges. Enbridge Gas does not track the number of customers disconnected where both gas charges and OBA charges are in arrears.
- h) The table below shows the number of OBA customers each year, calculated as the monthly average number of OBA bills issued each year. Enbridge Gas would note that the requested information is comparing an annual value (Total Disputes) to a monthly average (Average Number of Customers). This comparison will make the number of disputes relative to the number of customers appear higher.

	2014	2015	2016	2017	2018	2019(Jan-Sep)
Total Disputes	27,672	31,114	26,811	25,451	26,679	19,271
Average Number of Customers	1,436,253	1,434,901	1,422,615	1,412,113	1,402,877	1,390,936
Dispute as a Percentage of Average Number of Customers	1.93%	2.17%	1.88%	1.80%	1.90%	1.39%

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Previously Disputed Charges
EB-2018-0319 Supplementary Evidence Attachment 2, p. 4

Question(s):

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.

Response

- a) Enbridge Gas understands this request to relate to the scenario where a customer has reinstated a dispute because the customer did not agree with the Billers original dispute resolution. The Table below sets out the number of times that a dispute was reinstated, including under the scenario described as "Previously Disputed Charges" where a customer indicates that it had not agreed to the resolution and rebilling of charges previously disputed. Generally, that latter scenario will result in a dispute being reinstated twice (see response to Staff Interrogatory #9c). Where the dispute is reinstated for the second time, the charges are removed and blocked from future billing.

<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>
463	694	767	1,258	1,692	533

b) Please see the response to a).

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board Staff ("Staff")

Interrogatory

Reference:

Rental Buyouts
EB-2018-0319 Supplementary Evidence – Exhibit B – Tab 2 – Schedule 3

Question(s):

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?

Response

- a) There is no detailed description. The Bill Type Code describes the products, services and charges accommodated in the OBA program and the Biller makes the determination about which Bill Type Code best relates to the product, service or charge to be included on the customer's bill.
- b) During 2017, a single Biller gave small credits to a large number of their customers. (resulting in more than 120,000 Rental Adjustment transactions (credits) in 2017).
- c) Enbridge Gas confirms that the average value of Rental Buyout transactions has increased between 2014 and 2018. The amount of the charges is determined by the Billers.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Enercare Inc. ("Enercare")

Interrogatory

Reference:

Current OBA Complaint and Dispute Management Process
EB-2018-0319 Exhibit B – Tab 2 - Schedule 2

Preamble:

In paragraph 3, Enbridge states that Enbridge customers may raise disputes online or over the phone.

Question(s):

- a) Does Enbridge track the number of complaints specifically about the OBA dispute process?
- b) If yes, how many complaints did Enbridge receive in 2014, 2015, 2016, 2017 and 2018?

Response

- a) No.
- b) Please see the response to a) above.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Enercare Inc. ("Enercare")

Interrogatory

Reference:

Current OBA Complaint and Dispute Management Process
EB-2018-0319 Exhibit B – Tab 2 - Schedule 2

Preamble:

Paragraphs 1 to 9 describe the circumstances in which a charge is taken off of a bill under Enbridge's dispute resolution process. Table 1 presents the Total Disputes per Year and Total Number of Bills per Year.

Question(s):

- a) For each of 2014, 2015, 2016, 2017 and 2018, please provide the total number of charges that:
 - i. were removed from the bill under the outcome described in paragraph 5(i);
 - ii. were removed and blocked from the bill under the outcome described in paragraph 5(ii); and
 - iii. the customer agreed to pay under the outcome described in paragraph 5(iii).
- b) For each of 2014, 2015, 2016, 2017 and 2018, please provide the total number of disputes where:
 - i. the dispute process was reinstated after being recorded as resolved (as described in paragraph 6); and
 - ii. the charges were credited back to the customer after the dispute process was reinstated (as described in paragraph 7).
- c) If Enbridge does not have the information necessary to answer questions (a) and (b), please provide Enbridge's best estimate of the proportion of disputes that result in the removal of charges from the bill under Enbridge's dispute process.

Response

a) i. to iii.) Please see the response to Board Staff interrogatory #9 a).

b) Please see the table below.

	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019 (Jan - Sep)</u>
Total Number of Disputes Reinstated	2,068	1,939	2,279	2,729	3,330	1,852
Charges Credited Back by Enbridge after Dispute Reinstated	463	694	767	1,258	1,692	533

c) Please see the responses to a) and b) above.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Enercare Inc. ("Enercare")

Interrogatory

Reference:

Current OBA Complaint and Dispute Management Process
EB-2018-0319 Exhibit B – Tab 2 - Schedule 2

Preamble:

Paragraph 8 (and Attachment 3 referred to therein) provides an updated response to Vista interrogatory #4. Attachment 3 states, at page 6 of 22: "If the customer wants the Biller to invoice them using an alternate method and not on the Enbridge bill, the agent should refer the caller back to the Biller."

Question(s):

- a) Does Enbridge track how many customers request such separate invoices?
- b) If yes, how many customers make such requests?

Response

- a) No.
- b) Please see the response to a) above.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Enercare Inc. ("Enercare")

Interrogatory

Reference:

Exit & Termination Fees
EB-2018-0319 Exhibit B – Tab 2 – Schedule 3

Preamble:

Table 4 presents Transactions & Total OBA Bills. Table 6 presents the Number of Disputes & Total OBA Disputes.

Question(s):

Please confirm the accuracy of the table below based on information contained in Tables 4 and 6.

	2014	2015	2016	2017	2018
Number of Rental Buyout & Other Post Contract Items Transactions	60,189	54,634	62,170	195,598	80,762
Number of Disputes Related to Rental Buyout & Other Post Contract Items	2,000	1,684	1,953	2,070	1,937
Percentage	3.32%	3.08%	3.14%	1.06%	2.40%

Response

Confirmed. The data in the table is accurate.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Enercare Inc. ("Enercare")

Interrogatory

Reference:

Exit & Termination Fees
EB-2018-0319 Exhibit B – Tab 2 – Schedule 3

Preamble:

Table 1 contains 11 bill type codes related to rental buyout and other post-contract items.

Question(s):

For each of 2014, 2015, 2016, 2017 and 2018, please provide the total number of rental buyout and other post-contract items that were ultimately removed from the bill under Enbridge's dispute process.

Response

Please see the table below.

	2014	2015	2016	2017	2018	2019 (Jan-Sep)
Rental Buyout & Other Post Contract Items - Removed from the Bill by Enbridge	475	505	176	66	367	53

ENBRIDGE GAS INC.

Answer to Interrogatory from
Energy Probe ("EP")

Interrogatory

Reference:

Exhibit B, Tab 2, Schedule 2, Attachment 3, Page 5

Question:

- a) Do all OBA customers have a copy of their Customer Services Agreement? Please explain your answer.
- b) Does Enbridge have copies of Customer Services Agreements of OBA customers? Please explain your answer.

Response

- a) Billers are expected to comply with the CPA and the OBA Agreement. Part IV of the CPA requires that a supplier provide a copy of the consumer agreement to the consumer. This is also required by section 2.6.1 of the OBA Agreement.
- b) No, Enbridge Gas does not have copies of Customer Services Agreements of OBA customers. Per section 4.10.1 of the OBA Agreement, Enbridge Gas can request a copy of a Customer Services Agreement from a Biller at any time.

ENBRIDGE GAS INC.

Answer to Interrogatory from
HVAC Coalition ("HVAC")

Reference: [BOMA.3, Attachment]

Question:

Please provide a list of companies on the billers list that are currently on the Ontario Government Consumer Beware list. Please include in the list any biller that is not itself on the Consumer Beware list, but to the best of the Applicant's knowledge has an affiliated or associated company on that list, and provide details of that relationship if known.

Response

The table below sets out, to the best of Enbridge Gas' knowledge a list of companies on the billers list that are currently on the Ontario Government Consumer Beware List. The table is current as of May 16, 2019. Note that relationships between companies may have changed and the change in those relationships may not be known to Enbridge Gas. Note also that being included on the Consumer Beware List does not necessarily mean that complaints or disputes have been raised with Enbridge Gas about OBA program activities.

Biller Name	Affiliations/Relationships	Relationship
Canadian Home Improvement Credit Corporation	Ontario Go Green Corporation	Same Owner
Energy Canada Home Services Inc.	Energy Canada Home Comfort Ltd.	Same Owner
Ontario Home Services Inc.	Not Known	-
Ontario HVAC & Water Inc.	Not Known	-
Summitt Home Services LP	Not Known	-
Sunwave Home Comfort Inc.	Cricket Home Comfort Inc.	Not known
Utilebill Credit Corp.	UtileCredit Corp.	Same Owner
Utility Savings Corp.	Not Known	-

ENBRIDGE GAS INC.

Answer to Interrogatory from
HVAC Coalition ("HVAC")

Interrogatory

Reference:

[B/2/2, p. 1]

Question:

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.

Response

All OBA charges are initiated by the Biller. However, if there is a dispute, then (as described in Exhibit B, Tab 2, Schedule 1) the customer can initiate the dispute process which may result in charges being removed from the bill.

ENBRIDGE GAS INC.

Answer to Interrogatory from
HVAC Coalition ("HVAC")

Interrogatory

Reference:

[B/2/2, Attach 2, p. 2]

Question:

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.

Response

The dispute process is explained in the supplementary evidence (Exhibit B, Tab 2, Schedules 1 to 3). As can be seen, there is no standard dispute process. Depending on the circumstances, the customer may only be in touch with Enbridge Gas one time (after which time the dispute is resolved, or not resolved and the charge is removed), or the customer may be in touch with Enbridge Gas up to three times in total before the disputed charge is permanently removed.

ENBRIDGE GAS INC.

Answer to Interrogatory from
HVAC Coalition ("HVAC")

Interrogatory

Reference:

[B/2/2, Attach 2, p. 4]

Question:

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.

Response

Eliminating the dispute process will not eliminate the work required by Enbridge Gas to remove the product, credit the charges and block future billing. Even where Enbridge Gas simply accepted customer instructions to remove a charge, work still needs to be done to process the instructions. A process to notify Billers of the product(s) removed, charge(s) credited and future billing blocked is also required. This would require changes to the current automated processes, with accompanying costs.

Enbridge Gas is currently not in a position to comment on or provide details related to the potential savings (if any) from eliminating the dispute process without investigating the options for a revised process, which would include modifications to Enbridge Gas customer information systems and related applications (there is also the likelihood of reduced OBA customer volume if the opportunity to resolve disputes disappears). While Enbridge Gas will do whatever it can to accommodate Board-ordered process changes, the implementation timing may be complicated by the fact that the Enbridge Gas customer information system is currently under a change freeze as upgrading and integration activities proceed.

ENBRIDGE GAS INC.

Answer to Interrogatory from
HVAC Coalition ("HVAC")

Interrogatory

Reference:

[B/2/2, Attach 2, p. 4]

Question:

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.

Response

The Biller is obliged to ensure that its instructions about the resolution of a dispute to Enbridge Gas are accurate (section 7.6 of the OBA Agreement). Enbridge Gas does not take additional steps to ensure that Biller communications reflect the wishes of a customer.

ENBRIDGE GAS INC.

Answer to Interrogatory from
HVAC Coalition ("HVAC")

Interrogatory

Reference:

[B/2/2, Attach 3, p. 2-5] With respect to the Bill Type Codes:

Question:

- 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.

Response

- a) From Enbridge Gas's perspective, there is no difference between these Bill Type Codes (though some Billers may have their own views as to what is included in each). Enbridge Gas plans to consolidate (or re-name) these Bill Type Codes in the future. Enbridge Gas does not agree with the calculation set out in the question – taken together these three Bill Type Codes account for 28,684 disputes over the last five years (21%).
- b) Bill Type Codes are added at the request of Billers (after being approved by Enbridge Gas). No new Bill Type Codes have been added in the last several years. The Bill Type Codes describe the product/service and Enbridge Gas does not add any further explanation or detail. Therefore, Enbridge Gas does not have more information about the differences between these Bill Type Codes beyond what can be inferred from the descriptions already provided. Enbridge Gas confirms that the calculation set out in the question is correct.

ENBRIDGE GAS INC.

Answer to Interrogatory from
HVAC Coalition ("HVAC")

Interrogatory

Reference:

[B/2/2, Attach 3, p. 5]

Question:

Please explain in detail how Enbridge investigates whether Billers have breached their obligations under the OBA Agreement.

Response

When Enbridge Gas becomes aware that a Biller may have breached obligations under the OBA Agreement, the Company contacts the Biller to obtain further information about the transactions or activities in question. The Company may also contact the affected customer to obtain more information.

At an early stage, Enbridge Gas makes a determination about whether the issue can be resolved collaboratively with the Biller. This happens in cases of minor infractions such as where contact information for a Biller is out of date, or a customer has been unable to reach a Biller.

Where the issue appears more serious (such as misrepresentation) or is a repeated complaint, then Enbridge Gas will determine whether more information is required. In that circumstance, the Company may use its audit rights under the OBA Agreement to get documentation related to the transaction (including customer verification calls) and/or previous transactions in order to investigate the Biller's compliance with the OBA Agreement.

ENBRIDGE GAS INC.

Answer to Interrogatory from
HVAC Coalition ("HVAC")

Interrogatory

Reference:

[B/2/3, p. 3]

Question:

Please restate Table 4 replace the line "Total Number of OBA Bills" with Total Number of Rental Contracts".

Response

The number of Rental Contracts billed under the OBA Program can change daily. Rate Ready Rentals are the most billed transaction by Billers. The table below sets out the number of active Rate Ready Rentals on Enbridge Gas's billing system on December 12 of each year. Note that this number likely understates the number of rental contracts that Billers have with customers because not all Billers use the Rate Ready Rental and instead submit the charges using Bill Ready Transactions.

Please note also that the Number of Rental Buyout & Other Post Contract Items Transactions line in Table 4 includes Bill Type Codes that are not used for rental products. Additionally, there could be more than one post-contract item related to a single Rental Contract. Therefore, it cannot be implied that the ratio of "Rental Buyout & Other Post Contract Items Transactions" to the number of Rental Contracts, as set out in the percentage line of Table 4 below, precisely represents the proportion of Rental Contracts in a given year that had an associated Rental Buyout.

Table 4: Transactions & Total Rental Contracts

	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>
Number of Rental Buyout & Other Post Contract Items Transactions	60,189	54,634	62,170	195,598	80,762	63,580
Total Number of Rental Contracts	1,296,555	1,287,286	1,280,674	1,271,702	1,261,715	1,306,129
Percentage	4.64%	4.24%	4.85%	15.38%	6.40%	4.87%

Note: The Number of Rental Buyout & Other Post Contract Items Transactions includes data from January 2019 to September 2019.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Summit Home Services ("Summit")

Interrogatory

Reference:

Response to Vista Filed: 2019-05-29 EGI Ex. I, Vista.4, Page 2 of 5 Plus Attachment Vista response d. The setting out the number of disputes by billing item for the years requested.

Question:

Please provide a revised Table 1 to include up to the end of October 2019.

Response

Please see the table below. Data is available up to the end of September 2019. In the response to Vista interrogatory #4 Enbridge Gas provided the number of disputes by bill type code under the OBA program from 2014 to 2018. This was updated in Attachment 3 to Exhibit B Tab 2 Schedule 2 Page 3 of 3 of the Supplementary Evidence. Enbridge Gas has now determined that the tables provided were missing disputes where a Bill Type Code was not assigned. The table below includes disputes for which Bill Type Codes were not assigned.

Bill Type Code	Bill Type Code Description	2014	2015	2016	2017	2018	2019 (Jan-Sep)
0001	Merchandise	447	437	335	275	235	118
0002	Forced Air Furnace	18	17	9	130	248	78
0004	Account Set-up		14	6	7	4	7
0005	Comm. / Ind. Equipment	1	1	2			

0007	Dishwasher				2		1
0010	Air Conditioning	100	202	279	383	411	184
0011	Energy Audit				1	1	
0013	Water Heater	211	262	228	254	192	183
0014	Humidifier	7	16	7	44	198	81
0016	Swimming Pool Heater			3	1	1	
0020	Back Up Generator		3	1	3	3	1
0021	Fireplace		1	2	1		
0022	Air Cleaner	1	13	103	782	1,685	876
0025	Chimney Liner Charge	6	5	1	6	1	2
0026	Ducting / Piping Charge	71	67	82	58	46	55
0028	Air Filter Program				2	11	3
0030	Energy Eff. Products	97	131	123	74	39	35
0031	Smart Thermostat	167	209	109	107	126	125
0032	Roof Replacement	2		1	3		1
0035	Connected Home				30	100	97
0036	Hydronic Htg. Equip.	4	7	14	7	3	4
0037	Home Energy Monitoring				10	2	1
0038	Reduce Carbon Emissions				13	2	
0040	Water Conserv. Prod.			3	2	1	

0041	Home Security System	4	2	1	4	7	5
0042	Home Improvements	26	42	363	445	315	132
0044	Gas Boiler	4	6	6	4	5	7
0045	Window / Door	28	32	36	38	32	34
0046	Attic Insulation		1	1		2	55
0047	Account Settlement Rental HVAC	53	62	75	62	128	105
0048	Acct Settlement Rental Other	296	68	22	32	31	45
0049	Electrical Protection			2	56	172	180
0050	Kitchen Appliances					1	
0051	Water Heater	6,375	6,854	4,841	4,544	4,560	3,626
0052	Water Heater	80	78	82	65	58	35
0053	Space Heater			1	2	3	1
0054	Conversion Burner	26	24	18	10	2	
0055	Rental Discount			3			
0056	Space Conditioner	10	13	8	24	151	23
0057	Make-Up Air	6	1		1	2	
0059	Heat Exchanger	1		4	12	10	3
0060	Furnace	792	1,328	1,427	1,175	925	707
0061	Res. HVAC	544	706	734	733	863	708
0062	Comm. HVAC	16	28	26	24	36	38

0063	Fireplace	1					
0064	Unit Heater				2	3	
0065	Air Conditioner	338	531	666	568	461	377
0067	Commercial Water Heater	260	257	214	182	144	107
0068	Commercial Conversion Burner	4	6	1	4	2	1
0069	Commercial Space Heater	1				1	
0070	Supplemental Equipment	6	3	1	4	8	2
0072	Commercial Space Conditioner		2			4	1
0073	Home Services		2	1	1		3
0074	Water Softener	62	292	601	960	1,456	786
0075	Drinking Water System	201	232	542	1,076	1,649	1,233
0076	Heating Protection Plan	4,241	4,518	3,447	2,546	2,212	1,536
0077	Water Heater Protection Plan		7	2	4	1	3
0078	Rooftop Protection Plan	4	1	1	6	6	1
0079	Make-Up Air Protection Plan	1		3	2	6	
0080	Unit Heater Protection Plan	7	11	10	16	22	7
0081	Plumb / Drains Protection Plan	895	1,079	950	830	845	603
0084	Total Home Protection Plan	2,184	2,360	1,947	1,491	1,072	925
0087	Boiler Protection Plan	10	6	4	2	6	
0088	Cooling Plan	686	963	880	799	796	647

0089	Duct Cleaning Plan	64	92	71	42	39	25
0090	Filter Protection Plan	7	9	8	8	13	10
0091	Carbon Offset	446	341	232	310	1,005	612
0093	Carbon Credit	1		2			
0094	Inspection	1					
0095	Misc Products / Serv.	277	165	12	3	3	5
0096	Service Visit Adjustment	72	71	61	46	31	30
0097	Service Visit	1,631	1,615	1,149	999	880	586
0098	Miscellaneous	44	221	330	271	278	197
0100	Payment Protection Plan Prem.	39	26	17	11	9	7
0104	Plan Assistance Premium	37	40	27	15	12	33
0105	Plan Assistance Premium Adj.		1				
0106	Heating Maintenance Plan	2,298	2,809	2,328	1,713	1,330	1,069
0107	Cooling Maintenance Plan	1,208	1,522	1,404	1,123	891	740
0108	Fireplace Maintenance Plan	269	306	269	238	188	147
0109	Total Home Plan	85	101	58	71	145	170
0110	Protection Plan Adjustment	55	47	33	40	40	70
0112	Extended Service Plan Adj.						1
0115	Customer Service Sales Adj.						1
0116	Heating Protection Plan Adj.	52	94	49	58	40	35

0117	Cooling Protection Plan Adj.	12	16	14	11	8	17
0118	Heating Maintenance Plan Adj.	195	274	151	103	102	94
0119	Cooling Maintenance Plan Adj.	84	92	48	39	40	52
0120	Fireplace Maint. Plan Adj.	6	7	2	2	2	7
0121	Plumbing/Drain Plan Adj.	17	11	12	14	14	8
0122	Total Home Plan	57	43	18	17	28	27
0123	Account Settlement Merchandise	11	5	4	3	2	2
0124	Acct Settlement Prot. Plan	453	337	551	585	334	245
0125	Account Settlement Rentals	557	469	534	649	692	415
0126	Account Settlement Service	50	42	36	25	21	17
0127	Customer Relations Adjustment	8	4	8	6	21	15
0128	Rental Buyout	401	460	395	423	560	207
0129	Rental Removal	164	225	311	255	48	21
0130	Rental Adjustment	7	12	17	30	100	31
0139	Discount	500	462	222	243	191	445
#	Not Assigned	270	325	210	179	306	142
Grand Total		27,672	31,144	26,811	25,451	26,679	19,271

ENBRIDGE GAS INC.

Answer to Interrogatory from
Summit Home Services ("Summit")

Interrogatory

Reference:

EGI Ex.B, Tab 2, Schedule 3, Page 2 of 4 (4). Table 2 shows, for the entire OBA Program, the annual number of transactions (Debits or Credits) for each of the bill type codes related to rental buyout and other post contract items.

Question:

- a) Please provide a revised Table 2 to include up to the end of October 2019.
- b) Please identify the annual number of transactions (Debits or Credits) for each of the bill type codes related to rental buyout and other post contract items that had an associated open bill dispute (resolved or otherwise) prior to the transaction being submitted to Enbridge by the biller.
- c) Please identify the annual number of transactions (Debits or Credits) for each of the bill type codes related to rental buyout and other post contract items that had an associated open bill dispute post the transaction being submitted to Enbridge by the biller.
- d) Please identify the annual number of transactions (Debits or Credits) for each of the bill type codes related to rental buyout and other post contract items that had both an associated open bill dispute pre and post the transaction being submitted to Enbridge by the biller.

Response

- a) Please see below for a revised Table 2 showing transactions up to the end of September 2019.

Table 2: Annual Number of Transactions for Bill Type Codes

Code	Number of Transactions	2014	2015	2016	2017	2018	2019 (Jan-Sep)
47	Account Settlement Rental HVAC	2,439	2,056	2,407	2,349	3,453	2,097
48	Acct Settlement Rental Other	2,965	872	438	531	538	1,134
66	Balance Adjustment	10	21	22	25	43	14
123	Account Settlement Merchandise	317	201	279	193	170	130
124	Acct Settlement Prot. Plan	10,684	7,444	10,051	11,153	12,226	4,884
125	Account Settlement Rentals	31,141	26,003	27,718	37,667	39,569	34,034
126	Account Settlement Service	1,362	1,715	1,494	944	1,044	1,137
127	Customer Relations Adjustment	1,325	1,685	3,464	3,244	4,140	4,196
128	Rental Buyout	7,147	9,839	8,412	9,348	9,583	6,902
129	Rental Removal	2,366	2,927	3,378	3,319	2,899	1,137
130	Rental Adjustment	433	1,871	4,507	126,825	7,097	7,915
	Total	60,189	54,634	62,170	195,598	80,762	63,580

b) and d)

Enbridge Gas is unable to provide the requested data. The data for both requests is not tracked in a manner that allows Enbridge Gas to correlate buy-outs and other post contract items with earlier disputes related to the same rented product.

c) The annual number of transactions that had an associated open bill dispute post the transaction being submitted to Enbridge Gas is set out under the relevant bill type codes in the response to Vista interrogatory #4 d).

ENBRIDGE GAS INC.

Answer to Interrogatory from
Summit Home Services ("Summit")

Interrogatory

Reference:

EGI Ex.B, Tab 2, Schedule 3, Page 2 of 4 (5). Table 3 shows, for the entire OBA Program, the annual dollar amounts (Debits or Credits) for each of the bill type codes related to rental buyout and other post contract items.

Question:

Please provide a revised Table 3 to include up to the end of October 2019.

Response

Please see the table below.

Table 3: Dollar Amounts for Bill Type Codes

Code	Dollar Value of Transactions	2014	2015	2016	2017	2018	2019 (Jan-Sep)
47	Account Settlement Rental HVAC	\$ 36,589	\$ 17,299	\$ (17,942)	\$ (45,349)	\$ 176,780	\$ 74,933
48	Acct Settlement Rental Other	434,638	(24,838)	(7,006)	20,926	1,367	30,740
66	Balance Adjustment	664	(2,683)	(520)	(2,795)	2,981	510
123	Account Settlement Merchandise	(37,577)	(10,412)	(26,545)	(27,429)	(24,165)	(7,497)
124	Acct Settlement Prot. Plan	519,263	345,060	625,667	522,137	410,313	191,375
125	Account Settlement Rentals	(161,475)	(183,164)	(320,721)	212,788	(290,717)	(957,994)
126	Account Settlement Service	(213,421)	(203,855)	(77,105)	(111,284)	(85,427)	(117,429)
127	Customer Relations Adjustment	(155,469)	(199,892)	(360,832)	(368,252)	(419,441)	(435,945)
128	Rental Buyout	3,502,596	7,017,628	9,184,734	11,662,963	11,946,189	10,995,616
129	Rental Removal	403,232	508,756	562,045	400,693	151,363	75,634
130	Rental Adjustment	(23,918)	(300,753)	(672,519)	(621,492)	(585,068)	(1,162,781)
	Total	\$ 4,305,121	\$ 6,963,147	\$ 8,889,255	\$ 11,642,906	\$ 11,284,175	\$ 8,687,163

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition ("VECC")

Interrogatory

Reference:

Exhibit B, Tab 2, Schedule 2, page 3

Question(s):

- a) For each year 2014 through 2018 please show the total number of individual account disputes (that is remove from Table 1, the repeat account complaints).
- b) For each year please show the number of accounts which registered more than one complaint.

Response

- a) Please see the table below.

	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
Total Accounts with One Dispute	14,757	16,083	12,975	10,928	10,115
Total Number of Bills	17,235,033	17,218,806	17,071,374	16,945,352	16,834,525
Dispute as a Percentage of Bills	0.12%	0.13%	0.11%	0.10%	0.09%

- b) Please see the table below. For each account with multiple disputes, one dispute was created for each charge/product. For example, one account with two disputes would be for two different charges i.e., rental furnace & rental air conditioner. Please note that there may be more than two disputes in a "multiple dispute" scenario, which is why the sum of individual account disputes in part a) plus multiple disputes in part b) is less than the total number of annual disputes as set out in response to Staff interrogatory #9 b).

	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>
Accounts with Multiple Disputes	5,246	6,023	5,448	5,368	5,712

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition ("VECC")

Interrogatory

Reference:

Exhibit B, Tab 2, Schedule 2, Attachment 1, page 2

Question(s):

The Billing and Collection Services Agreement ("Billing Agreement") states *"to the extent the Biller, rather than the Company, receives notice of the Customer Billing Dispute, the Biller shall forthwith notify the Company of the existence of such Customer Billing Dispute;"*

- a) For each year please provide the total number of complaints forwarded to EGI from Billers. Please clarify if these complaints are included in the Total Dispute line of Table 1.

Response

Enbridge Gas is not aware of any instance where a Biller has notified Enbridge Gas of a dispute.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vulnerable Energy Consumers Coalition ("VECC")

Interrogatory

Reference:

Exhibit B, Tab 2, Schedule 2, Attachment 1, page 3

Question(s):

- a) For each year 2014 through 2018 please provide separately the number of CPA and non-CPA registered disputes
- b) For each year 2014 through 2018 please provide (i) the number of non-CPA disputes which were not resolved within 45 days; (ii) the number of CPA disputes that were not resolved within 15 days.
- c) Please provide the number of complaints in each year 2014 through 2018 in which the customer contacted EGI challenging that the Biller's suggestion that the matter was resolved.
- d) Please provide the number of "Dispute Notices" received by EGI for each of the years 2014 through 2018.

Response

- a) Please see the response to Board Staff interrogatory #9 b).
- b) Please see the response to Summit interrogatory #2 and the table below.

	2014	2015	2016	2017	2018	2019 (Jan-Sep)
Non-CPA Resolved within 45 days	23,715	24,967	23,120	21,105	19,411	14,329
Non-CPA Not resolved within 45 days	2,001	4,295	1,993	2,704	4,209	1,058
CPA Resolved within 15 days	1,743	1,542	1,486	1,302	2,109	3,710
CPA Not resolved within 15 days	213	340	212	340	950	174
Total Disputes	27,672	31,144	26,811	25,451	26,679	19,271

- c) Please see the response to Enercare interrogatory #3 b.
- d) Enbridge Gas does not believe that it has been provided with any dispute notices pursuant to section 7.7.2 of the OBA Agreement.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vista Credit ("Vista")

Reference:

ExB/T2/S2/p.2, paragraph 6.Question(s):

Question(s):

- a) Would EG be able to institute a process which requires;
 - i. The customer to contact EG to verify resolution of a dispute?
 - ii. The Biller to provide EG with an acknowledgement signed by the customer to verify resolution of a dispute?In each case, please identify any concerns or impediments to implementing such a process.
- b) Would EG's systems be capable of providing, or could they be modified to provide, on-line functionality for an OBA customer to provide instructions regarding addition/deletion/reinstitution of OBA charges on their EG bill? If modification would be required, please comment on cost and time required for such modifications.

Response

- a)
 - i. and ii. Yes, Enbridge Gas would be able to institute a process for both instances. However, doing so would increase the cost of administering the OBA program. In either instance the number of steps required to resolve a dispute, relative to the current process, will be increased. Enbridge Gas expects that instituting the processes would result in a significant increase in call volumes, program administration and back-office work. Enbridge Gas would look to recover these costs, potentially through a per-dispute fee charged to Billers.
- b) Yes. Enbridge Gas' systems could be modified. Enbridge Gas is currently not in a position to comment on or provide details related to the costs and time required for modifications without specific details on what those modifications would be. Further, the Enbridge Gas customer information system is currently under a change freeze

as upgrading and integration activities proceed. Enbridge Gas does not believe any major changes could be made until late 2021 at the earliest.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Vista Credit ("Vista")

Reference:

ExB/T2/S1/p.1, para. 3, item i).

One of the unsettled items in this case includes what control OBA customers should have over the addition of charges on their EG bill.

Question(s):

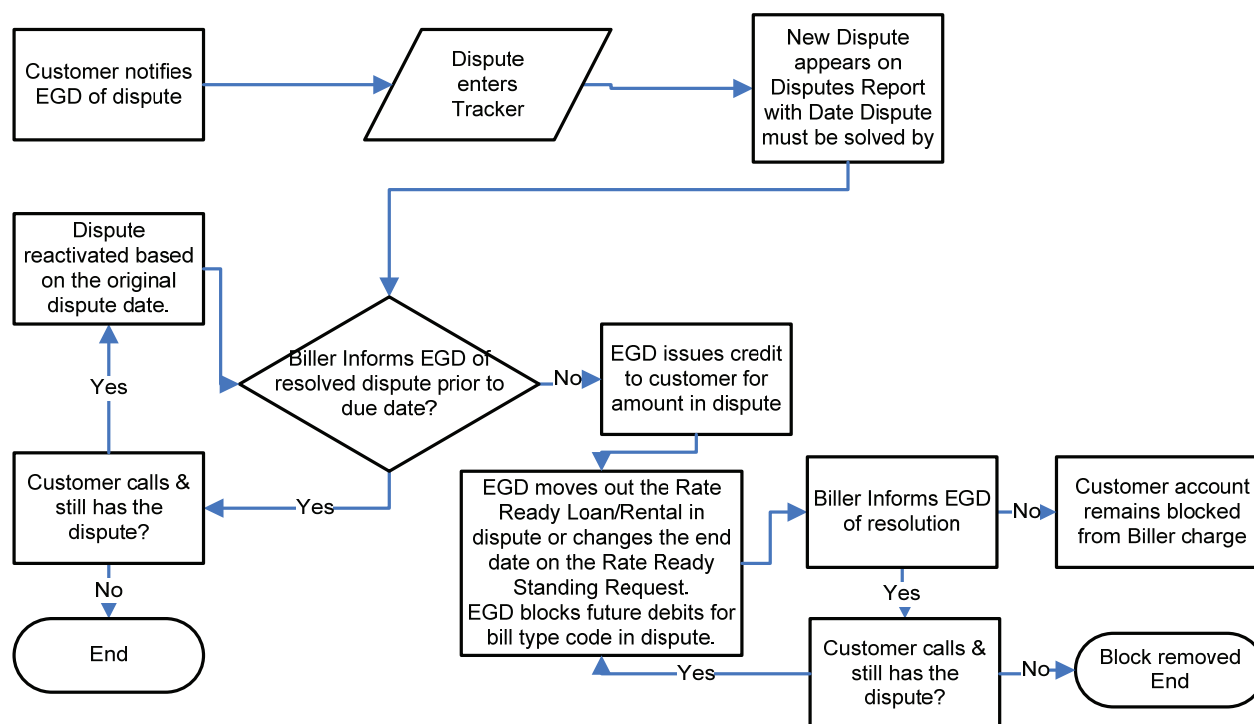
- a) Please confirm that Billers need not produce any documentary acknowledgment from a customer in order to add charges to that customer's bill.
- b) Could EG institute a process which requires a Biller to provide a signed acknowledgement from a customer in order to add charges to that customer's bill? Please identify any concerns or impediments to implementing such a process.

Response

- a) Billers do not need to provide documentary acknowledgement from a customer to add charges to that customer's bill.
- b) Yes, Enbridge Gas could institute a process which requires a Biller to provide a signed acknowledgement from a customer in order to add charges to that customer's bill. However, the number of steps required to add charges to a customer's bill relative to the current process would be increased and the current process would need to change. Enbridge Gas expects that instituting the process would result in a significant increase program administration and back-office work. Enbridge Gas would look to recover these costs, potentially through a fee charged to Billers. Further, the Enbridge Gas customer information system is currently under a change freeze as upgrading and integration activities proceed. Enbridge Gas does not believe any major changes could be made until late 2021 at the earliest.

Flow Diagram of Customer Billing Dispute Process

The Biller Disputes process flow diagram below illustrates the dispute process.



Reinstated Disputes

A reinstated dispute is one where:

- (a) the Customer did not agree with the Biller's original dispute resolution and requests that Enbridge reinstate the dispute; or
- (b) the Biller did not perform the activities required by the dispute resolution (e.g. deleting a transaction or providing a credit) within the time period discussed above.

Reinstated disputes can be identified on the Disputes Report by looking at the Reinstatement Indicator field (the 2nd last field on the dispute detail record). If this indicator is greater than zero (>0) then this is a reinstated dispute.

Previously Disputed Charges

Billers shall not bill charges that were the subject of, associated with, related to or arose out of, a Customer Billing Dispute unless the Customer has agreed to the resolution. This responsibility applies to all Billers that seek to bill such charges, regardless of whether the Biller originally submitted the charge that resulted in the Customer Billing Dispute, or whether a new Biller is requesting EGD to bill such a charge. EGD 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 Customer Billing Disputes unless the Customer has agreed to the resolution and rebilling of such charges.