



Burlingtonhydro inc.

Board Secretary  
Ontario Energy Board  
27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON  
M4P 1E4

June 2, 2020

Dear Ms. Walli,

**Re: Burlington Hydro Inc.  
Application for License Amendment and Temporary Exemption from the Customer Service Rule Changes effective March 1, 2020  
Board File Number: EB-2019-0265**

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On March 14, 2019 the Ontario Energy Board ("Board") issued a *Notice of Amendments to Codes and a Rule Amendments to the Distribution System Code, Standard Supply Service Code, Unit Sub-Metering Code, and Gas Distribution Access Rule (and Associated Rate Order)* under Board File Number EB-2017-0183 ("Customer Service Rule Amendments"). Among these Customer Service Rule Amendments were rule changes to Security Deposits, Billing and Payment, and Disconnection for Non-Payment, which became effective March 1, 2020.

On January 10, 2020, Burlington Hydro ("BHI") requested a license amendment under Section 74(1) of the OEB Act and a temporary exemption from section 2.6.3 of the DSC and section 2.6.2 (d) of the SSSC effective March 1, 2020 and ending August 31, 2020.

The rationale for the exemption request was that BHI was in the process of implementing a new Customer Information System ("CIS"), which will meet all the requirements of the amended customer service rules, with an estimated in-service date in Q3 of 2020.

On February 11, 2020 the Board granted the application for a temporary exemption until August 31, 2020.

Since the Board's approval of BHI's temporary exemption, the COVID-19 pandemic has further delayed the in-service date of BHI's new CIS. Key project resources have been re-allocated from the CIS project to:

1. support unplanned customer service and billing system changes related to the COVID-19 pandemic, including:
  - a) The Emergency Order fixing the Regulated Price Plan ("RPP") time-of-use ("TOU") prices at 10.1 ¢/kWh, effective March 24, 2020 to May 31, 2020;



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- b) The Government of Ontario announcement fixing the RPP TOU prices at 12.8 ¢/kWh, effective June 1, 2020 to October 31, 2020;
  - c) The Emergency Order to defer a portion of Global Adjustment charges for industrial and commercial electricity consumers;
  - d) OEB Guidance on Waiving or Lowering Late Payment Charges;
  - e) The Government of Ontario announcement of the COVID-19 Energy Assistance Program (CEAP) and COVID-19 Energy Assistance Program for Small Business (CEAP-SB), for which the application process is to be managed by the local utility;
  - f) The Government of Ontario announcement requiring LDCs to offer RPP TOU customers the option to choose between TOU prices and tiered prices effective November 1, 2020; and
2. support continued business operations in light of the challenges imposed by the COVID-19 pandemic, such as:
- a) IT requirements to accommodate an increased number of staff working from home and increased demand for remote meeting capabilities; and
  - b) Reallocation of customer service resources to collections as a result of increased collection activity in August and September (original go-live period) as a result of the extension of the disconnection moratorium to July 31, 2020.

BHI expects its new CIS to be live by the end of 2020. As such, BHI respectfully requests to extend its current license amendment under Section 74(1) of the OEB Act and its temporary exemption from section 2.6.3 of the DSC and section 2.6.2 (d) of the SSSC from August 31, 2020 to December 31, 2020.

Yours truly,

*Original signed by*

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