

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

August 27, 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

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.

On June 2, 2020, Burlington Hydro ("BHI") requested 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. The rationale for the extension request was that the CIS go-live date was delayed due to key project resources being re-allocated from the CIS project to support unplanned customer service and billing system changes related to the COVID-19 pandemic; and to support continued business operations in light of the challenges imposed by the COVID-19 pandemic.

On July 23, 2020 the Board granted the extension request to December 31, 2020 (EB-2020-0154).





Since the Board's approval of BHI's extension request, the COVID-19 pandemic has further delayed the in-service date of BHI's new CIS. Implementing the customer service and billing system changes related to the COVID-19 pandemic while supporting continued business operations is proving to be more time and resource intensive than originally estimated.

BHI expects its new CIS to go live in Q1 of 2021. 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 December 31, 2020 to March 31, 2021.

Yours truly,

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