



Burlingtonhydro inc.

Board Secretary
Ontario Energy Board
27th 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 proposed amendments to the Standard Supply Service Code (SSSC) to enable electricity consumers on the Regulated Price Plan (RPP) to opt out of time-of-use (TOU) prices and to elect instead to be charged on the basis of tiered pricing starting November 1, 2020

On July 15, 2020 the Ontario Energy Board ("Board") gave notice under section 70.2 of the *Ontario Energy Board Act, 1998* (OEB Act) of proposed amendments to the Standard Supply Service Code (SSSC) to enable electricity consumers on the Regulated Price Plan (RPP) to opt out of time-of-use (TOU) prices and to elect instead to be charged on the basis of tiered pricing, starting November 1, 2020.

Burlington Hydro Inc. ("BHI") is in the process of implementing a new Customer Information System ("CIS"), with an estimated in-service date in Q1 of 2021. The new CIS will be configured to enable electricity consumers on the RPP to opt out of TOU prices and to elect instead to be charged on the basis of tiered pricing.

In order to implement the proposed amendments to the SSSC for the period from November 1, 2020 to the new CIS in-service date, significant changes to, and investment in, BHI's existing legacy CIS would be required. BHI's existing CIS is 25 years old, was originally acquired and implemented in 1994-1995 and has been heavily customized to meet the needs of the regulated Ontario electricity market. The vendor no longer provides full CIS upgrades in the Ontario market. Implementing the proposed amendments to the SSSC in the legacy CIS presents the following challenges:

- Invasive changes required to the core of the original design, which require costly and challenging programming changes;
- Acquiring availability from a single resource in the market to modify the existing CIS and its soon to be obsolete technology;
- Relying on this single resource to provide support following implementation of these changes;



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- Increased monthly operating support fees for the legacy system;
- Significant testing required due to the nature of the modifications and associated risks; and
- This significant investment in changes to the legacy system would be useful for only the few months remaining in the lifetime of the software.

The new CIS system already supports this requirement and therefore does not pose the same risks or challenges.

Further, implementing changes to BHI's existing CIS to accommodate the proposed amendments to the SSSC would be duplicative and require that key resources be re-allocated from the implementation of the new CIS to the programming, configuration, and testing of a soon-to-be obsolete system. Key project resources have already been 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.

Customer service and billing staff would require training and business process realignment for two CIS platforms, at approximately the same time. This has the potential to create confusion and prolong customer response times. A manual workaround is impracticable – the method by which customers are billed (RPP TOU or Tiered) must be programmed into the CIS in order to calculate, produce and issue bills.

BHI expects its new CIS to go live in Q1 of 2021. The additional burden of invasive legacy system changes at this time would compromise this cutover projection. As such, BHI respectfully requests a license amendment under Section 74(1) of the OEB Act and a temporary exemption from the relevant sections of the SSSC from November 1, 2020 to March 31, 2021.

Although the OEB indicated it will not implement amendments to the SSSC until such time as the amendments to O. Reg. 95/05 are made, BHI wanted to provide the Board sufficient time to consider and respond to this request.

Yours truly,

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