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BY EMAIL and RESS

Ms. Christine Long, Registrar
ONTARIO ENERGY BOARD
2300 Yonge Street, 26th Floor, P.O. Box 2319
TORONTO, ON M4P 1E4

Re: Board File No. EB-2019-0217
KWHI Application for an extension to the Exemption from Customer Service Rules

Dear Ms. Long:

On March 14, 2019, the Ontario Energy Board ("OEB" or the "Board") issued amendments to the Distribution System Code ("DSC") and Standard Supply Service Code ("SSSC") under Board file number EB-2017-0183. A number of these amendments were effective March 1, 2020. On August 30, 2019, Kitchener-Wilmot Hydro Inc. ("KWHI") requested a temporary exemption from some of the amendments until April 1, 2021 as KWHI was in the process of implementing a new Customer Information System ("CIS").

On February 11, 2020, KWHI was granted an exemption to 4.2.4A of the DSC and 2.6.2 of the SSSC. The exemption is set to expire on December 31, 2020, which was the month KWHI expected to go-live. Based on its current estimates, KWHI will not go-live until April 2021 and continues to be unable to implement the measures it is exempted from above until its new CIS goes into service.

At this time, KWHI is requesting an extension to the exemption until June 30, 2021. Implementing the new CIS from an existing 35-year-old COBOL based legacy system is taking a considerable amount of time and current estimated go-live date is April 30th, 2021. The new customer information system is programmed to fully implement DSC 4.2.4A and SSSC 2.6.2.

KWHI continues to take appropriate steps to address customer concerns in relation to non-payment of accounts and disconnection notices as part of its regular customer services.

Questions or concerns in this matter should be addressed to the undersigned.

Respectfully submitted,

Margaret Nanninga, MBA, CPA, CGA
Vice President Finance & CFO