



December 10, 2020

**BY EMAIL and RESS**

Ms. Christine Long, Registrar  
ONTARIO ENERGY BOARD  
2300 Yonge Street, 27<sup>th</sup> Floor, P.O. Box 2319  
TORONTO, ON M4P 1E4

Re: Board File No. EB-2020-0259  
KWHI Application for an extension to the Exemption from Customer Service Rules

---

Dear Ms. Long:

On March 14, 2019, the Ontario Energy Board (“OEB”) 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 original month KWHI expected to go-live.

On October 30<sup>th</sup>, 2020, KWHI requested an extension to this exemption as the implementation of the new CIS has been delayed. The rationale for requesting the original exemption is that it is not economically feasible to change the legacy system for the new customer service rules. Reallocation of resources to the legacy system would delay implementation of the new CC&B system. These reasons have not changed.

On December 8<sup>th</sup>, 2020, KWHI was asked for specific reasons as to why KWHI’s implementation has been delayed. System implementation has been delayed for several reasons including legacy system changes that could not be avoided (i.e., customer choice), custom coding for the Ontario electricity market and the impact of COVID-19. In the absence of new system implementation, there continues to be a requirement for an exemption to customer service rules.

KWHI is requesting an extension to the exemption until June 30, 2021. KWHI is expecting to “go-live” in April 2021, however, with the uncertainties surrounding COVID-19, there is potential for further delays. By requesting an exemption beyond the current expected go-live date, KWHI would avoid requesting a second exemption. KWHI reiterates that it will



**Margaret Nanninga, MBA, CPA, CGA**  
Vice President Finance & CFO  
T | 519-749-6177  
F | 519-745-2360  
mnanninga@kwhydro.ca

be implementing the new customer service rules as soon as the new CIS system is implemented and will not require an exemption after go-live.

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