



Burlingtonhydro inc.

Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON
M4P 1E4

December 21, 2020

Dear Ms. Long,

**Re: Burlington Hydro Inc.
Application for License Amendment and Temporary Exemption from Customer
Service Rule Changes and MIST Metering Implementation**

Burlington Hydro Inc. ("BHI") respectfully requests the following license amendments and temporary exemptions from the Customer Service Rule Amendments and MIST Metering Implementation as follows:

1. An extension of its current license amendment under Section 74(1) of the OEB Act and its temporary exemption from section 2.6.3 of the Distribution System Code ("DSC") and section 2.6.2 (d) of the Standard Supply Service Code ("SSSC") from March 31, 2021 to June 30, 2021; and
2. A temporary exemption from Section 5.1.3(b) of the DSC from March 31, 2021 to September 30, 2021.

These requests are explained in further detail below; and are the result of delay in the implementation of BHI's Customer Information System ("CIS"), primarily driven by the COVID-19 pandemic.

Customer Service Rules:

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, 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 CIS, which will meet all the requirements of the amended customer service rules. Programming these changes in BHI's legacy CIS would be duplicative, costly and require investment in a soon to be obsolete system.

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

On August 27, 2020 BHI requested to extend its license amendment and temporary exemption to March 31, 2021. 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 November 19, 2020 the Board granted BHI's extension request to March 31, 2021 (EB-2020-0214).

As a result of a further delay in the implementation of BHI's CIS as described below, BHI respectfully requests a temporary exemption to June 30, 2021.

MIST Metering Implementation:

On August 21, 2014, amendments to Section 5.1.3 of the DSC came into force requiring distributors to (a) install a MIST ("Metering Inside the Settlement Timeframe") meter on any new installation that is forecast by the distributor to have a monthly average peak demand during a calendar year of over 50 kW; and (b) to install a MIST meter on any existing installation that has a monthly average peak demand during a calendar year of over 50 kW by August 2020.

BHI is compliant with Section 5.1.3 (a) of the DSC and was on track to be compliant with Section 5.1.3 (b). However, the impacts of the COVID-19 pandemic caused significant delays to the project which was dependent on the implementation of BHI's new CIS. As such, on May 22, 2020 BHI requested a temporary exemption from Section 5.1.3(b) of the DSC from August 21, 2020 until December 31, 2020.

On July 23, 2020, the Board issued an industry wide decision amending the licenses of each electricity distributor, such that they shall be exempted from having to comply with Section 5.1.3 (b) of the DSC until March 31, 2021.

As a result of a further delay in the implementation of BHI's CIS as described below, BHI respectfully requests a temporary exemption to September 30, 2021.



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Delayed CIS Implementation

Unplanned policy and pricing changes and the introduction of new customer support programs stemming from the COVID-19 pandemic have further impacted the scheduled implementation of BHI's new CIS.

Since BHI's last request for a temporary exemption on August 27, 2020 the following unplanned regulatory and billing changes have been introduced, which BHI has had to prioritize ahead of its CIS implementation:

- New Regulated Price Plan (RPP) rates, effective January 1, 2021;
- Programming, testing and bill presentment changes associated with three sets of electricity and OER rates over a two month period (potential for some customer bills to have three sets of RPP TOU or Tiered prices);
- Amendments to O. Reg. 275/04, including a revised on-bill message, and the revocation of section 8.4(2)(b), which stated that the Total Ontario Support message did not apply to consumers only receiving the OER; and
- Amendments to the 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, effective November 1, 2020.

In addition, licence amendments requiring Utilities to deliver COVID-19 Energy Assistance Programs (CEAP and CEAP-SB) to their eligible residential and small business customers has proven to be more time and resource intensive than BHI originally estimated.

Implementing these changes resulted in the re-allocation of key resources away from the CIS project. Many of the changes required testing in the CIS development environment. BHI only has one development environment, which as a result, rendered it unavailable for testing for the CIS implementation. These factors along with the operational challenges related to the COVID-19 pandemic have further delayed the in-service date of BHI's new CIS.

BHI is dependent on the implementation of its new CIS to:

- i. Implement the Customer Service Rule Amendments under section 2.6.3 of the DSC and section 2.6.2 (d) of the SSSC; and
- ii. Process the interval reads from the new MIST meters and bill GS>50kW customers on an hourly basis, per section 5.1.3 (b) of the DSC.



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BHI's delayed CIS implementation impacts its ability to comply with the stated sections of the DSC and SSSC by March 31, 2021. BHI expects its new CIS to go live by June 30, 2021. The CIS implementation will incorporate the changes to the Customer Service rules. However, the MIST meter implementation cannot be commenced until after the new CIS is live. As such, BHI respectfully requests the following exemptions:

1. An extension of its current license amendment under Section 74(1) of the OEB Act and its temporary exemption from section 2.6.3 of the Distribution System Code ("DSC") and section 2.6.2 (d) of the Standard Supply Service Code ("SSSC") from March 31, 2021 to June 30, 2021; and
2. A temporary exemption from Section 5.1.3(b) of the DSC from March 31, 2021 to September 30, 2021.

Yours truly,

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