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BY EMAIL

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

Re: EB-2021-0141
Previous Board File Numbers EB-2019-0217 and EB-2020-0259
KWHI Application for an extension to the Exemption from Customer Service Rules

Dear Ms. Long:

On April 14, 2021, Kitchener-Wilmot Hydro Inc. ("KWHI") requested an extension to its exemption from Section 4.2.4A of the Distribution System Code ("DSC") and 2.6.2 of the Standard Supply Service Code ("SSSC"). The current exemptions were set to expire in April 2021.

The implementation of its new customer information system (CIS) has certainly been a challenging project for KWHI and, upon completion, will have been a two-year project. Constantly changing regulatory requirements (rates), COVID-19 and changes to staff have added to some of the difficulties faced by KWHI. In addition, KWHI continues to recognize that reprogramming its legacy system for changes is time consuming and a waste of valuable resources. Since KWHI has not yet gone live with its new CIS system, KWHI must again request another extension to its current exemptions previously granted by the OEB. KWHI commits to implementing the project before the end of September 2021. As soon as the project is implemented, the exemptions will no longer be required.

The following chart represents the major milestones for the project and the percent completion to date:

Milestone	Percent Complete
Bill redesign and testing	90%
Complete data conversion from legacy to CC&B	80%
Complete Integrated Tests	78%
Complete Verification of Equal Payment Plan, OESP, and Retail Transactions Settlement	70%
Complete of priority#1 reports	55%
Complete Training development	40%
Deliver training	0%

As can be seen, KWHI has completed a significant portion of the project.

In EB-2020-0259, KWHI requested an exemption until April 2021, as the new CIS was to go-live on April 19, 2021. Section 4.2.4A states “At least 7 days before issuing a disconnection notice for non-payment, a distributor shall deliver an account overdue notice to the customer...” In EB-2019-0217, KWHI stated that it could not adopt this timeline in the legacy system, nor could it perform this process manually as it issues up to 300 overdue notices in a day.

KWHI’s current disconnection process includes delivering an account overdue notice 4 - 7 days after the bill is due. Then a disconnection notice is delivered 4 – 7 days later.

When the current disconnection ban ends on June 3rd, KWHI will issue disconnection notices to customers who have been issued an overdue notice. KWHI continues to work with its customers and only resorts to disconnection when all other solutions have been exhausted (i.e., LEAP, CEAP or arrears payments agreements).

KWHI reiterates that the new CIS is programmed to fully implement DSC 4.2.4A and SSSC 2.6.2.

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

Respectfully submitted,

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