



Burlingtonhydro inc.

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

May 20, 2021

Dear Ms. Long,

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

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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 June 30, 2021 to September 30, 2021; and
2. A temporary exemption from Section 5.1.3(b) of the DSC from September 30, 2021 to December 31, 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).

On December 21, 2020 BHI requested to extend its license amendment and temporary exemption to June 30, 2021. The rationale for the extension request was that the CIS go-live date was further delayed due to key project resources being re-allocated from the CIS project to support unplanned policy and pricing changes and the introduction of new customer support programs stemming from the COVID-19 pandemic; and to support continued business operations in light of the challenges imposed by the COVID-19 pandemic.

On March 4, 2021 the Board granted BHI's extension request to June 30, 2021 (EB-2020-0307).

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.

#### 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.

On December 21, 2020 BHI requested to extend its temporary exemption to June 30, 2021. The rationale for the extension request was that the CIS go-live date was further delayed and that BHI was dependent on the CIS implementation to 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.



On March 4, 2021 the Board granted BHI's extension request to September 30, 2021 (EB-2020-0307).

As a result of a further delay in the implementation of BHI's CIS as described below, BHI respectfully requests a temporary exemption to December 31, 2021.

#### Delayed CIS Implementation:

The scheduled implementation of BHI's CIS continues to be negatively impacted by the COVID-19 pandemic due to the challenges coordinating internal and external resources remotely. In addition, unplanned policy and pricing changes and the introduction of new customer support programs stemming from the COVID-19 pandemic continue to impact timelines.

Since BHI's last request for a temporary exemption on December 21, 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;
- New Regulated Price Plan (RPP) rates, effective February 23, 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); and
- Revised COVID-19 Energy Assistance Program (CEAP and CEAP-SB) eligibility requirements and funding caps, issued on January 14, 2021, which required Utilities to re-process all previously rejected applications using the new eligibility criterion and notify customers that previously received a credit that the funding limits per customer had been increased.

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.

BHI's delayed CIS implementation impacts its ability to comply with the stated sections of the DSC and SSSC by June 30, 2021. BHI expects its new CIS to go live by September 30, 2021. The CIS implementation will incorporate the changes to the Customer Service rules.



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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 June 30, 2021 to September 30, 2021; and
2. A temporary exemption from Section 5.1.3(b) of the DSC from September 30, 2021 to December 31, 2021.

Yours truly,

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