



Energizing Our Community

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October 25, 2010

Via RESS and by courier

*10/26/10*  
Ontario Energy Board  
2300 Yonge St., 27<sup>th</sup> Floor  
P.O. Box 2319  
Toronto ON  
M4P 1E4

Attn: Kirsten Walli, Board Secretary

Re: **Amendments to Customer Service Rules in the Distribution System Code,  
the Retail Settlement Code and the Standard Supply Service Code - Board  
File No: EB-2007-0722**

Dear Ms Walli:

Orillia Power Distribution Corporation wishes to submit comments regarding the current efforts of OPDC in the ongoing implementation of Amendments to Customer Service Rules in the Codes outlined in the Board's letter dated July 2, 2010 in the Ontario Energy Board Proceeding EB-2007-0722.

Any questions or concerns can be directed to me at [pwelsh@orilliapower.ca](mailto:pwelsh@orilliapower.ca) or (705)326-2495 ext 240.

Yours respectfully,

Pauline Welsh  
Regulatory Officer

OEB BOARD SECRETARY	
File #	<i>EB-2007-0722</i> Sub File: <i>19</i>
Panel	
Licensing	
Other	<i>John V.</i>
CO/CA	<i>E-filing #10251</i>





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Ontario Energy Board Notice of Amendments to Codes - Board File No: EB-2007-0722  
Customer Service Rules – All Residential Customers

OPDC offers the following comments with regard to the implementation of changes set out in the Board's Notice of Amendments to Codes dated July 2, 2010:

Distributors had appealed to the Board during proceedings leading up to the Notice of Amendments to Codes that many of the proposed changes would require significant time to implement. At that time, actual time requirements and programming and related costs were not available.

In its decision, the Board adopted a phased approach towards implementation of the customer service code amendments: Suspending Disconnection Action and Arrears Management Programs come into force October 1, 2010; Bill Issuance and Payment, Disconnection Notices, Disconnection Procedures, and Security Deposits come into force January 1, 2011; and Equal Monthly Payments, Billing Adjustments, and Opening and Closing Accounts come into force April 1, 2011.

OPDC is among a group of distributors using the Northstar CIS billing system who have been working diligently with the system provider since the Notice of Amendments to Codes issued on July 2, 2010. The focus has been on amendments coming into force on October 1, 2010. In order to implement the Arrears Management Program, it was also necessary to implement the requirement to apply security deposits against any arrears before a disconnection notice can be issued to a residential customer. While work began immediately, a Scope of Work was only recently finalized. Identifying the necessary modifications to existing Northstar processes and developing new processes to automate the Arrears Management Program and related suspension of disconnection were the primary focus.

The Scope of Work prepared by Northstar is included as Attachment A. The total labour effort is 1,170 hours and estimated completion date for the arrears management program with testing and full functionality is early January 2011. Many practical issues are emerging as the new modules are tested. Our utility has opted not to implement the software changes until bugs are identified and fixed during beta testing. In the meantime we have implemented manual procedures and work-arounds in an effort to remain compliant. These manual procedures are labour intensive and costly. Manual tracking



will be necessary on a temporary basis and this is very dependent on available staff resources which are already strained.

Efforts are also underway to address the amendments coming into force January 1, 2011. We expect that manual procedures will continue to be necessary well into 2011 until further automation options can be fully explored. Our group of distributors is looking for consensus on solutions to reduce redundancy and adopt consistency in application.

Programming from planning to implementation for all the customer service changes is expected to take up to 12 months. Software changes are only part of the process. Procedural changes and training are ongoing as the manual processes continue to be reviewed for further efficiencies.

We respectfully ask that the Board acknowledge the intensive efforts required to implement the July 2, 2010 changes coming into force as well as additional proposed amendments to customer service rules for low-income customers expected to follow soon. The expansion of customer service options accommodating a range of customer needs is extremely challenging. Automation wherever possible is desired to streamline processes, ensure accuracy and consistency and avoids dependence on time consuming manual checks and tracking. Even with automation, the new processes are in addition to existing processes which are not eliminated. Bottom line, more work.

We are working under extremely tight time constraints to implement the OEB's changes to customer service rules across the province. We are asking for more realistic implementation timelines before the new rules come into force.