

| E-Bill %               | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | Source(s):                                      |
|------------------------|------|------|------|------|------|------|------|------|------|------|------|------|-------------------------------------------------|
| Ellexicon (w/ DX Next) | 23%  | 25%  | 27%  | 28%  | 34%  | 36%  | 36%  | 39%  | 43%  | 47%  | 51%  | 55%  | 4-CCC-46(d) + 4-CCC-51/Attachment 1             |
| Alectra                |      |      |      |      | 45%  | 51%  | 58%  | 60%  | 63%  | 66%  | 67%  | 68%  | EB-2025-0252 / 4-Staff-177(b)                   |
| Burlington             |      | 40%  |      |      | 45%  |      |      |      |      |      |      |      | EB-2025-0051 / Exhibit 4 (p.27)                 |
| Hydro Ottawa           | 55%  | 60%  | 62%  | 65%  | 70%  |      |      |      |      |      |      |      | EB-2024-0115 / 1-SEC-18                         |
| Oshawa Power           |      |      |      |      | 49%  | 54%  |      |      |      |      |      |      | EB-2025-0014 / 4-CCC/VECC-130 + Exhibit 4(p.43) |
| Toronto Hydro          | 41%  | 45%  | 48%  | 51%  | 54%  | 55%  | 57%  | 58%  | 59%  | 60%  |      |      | EB-2023-0195 / JT3.7                            |
| Average Actual Peers   |      |      |      |      | 53%  |      |      |      |      |      |      |      |                                                 |

| Ellexicon Customer Care                                              | 2020    | 2021    | 2022    | 2023    | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    | 2030    | 2031    | Sources                                                                                                                   |
|----------------------------------------------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------------------------------------------------------------------------------------------------------------------------|
| Contacts                                                             | 129,500 | 127,500 | 106,500 | 110,500 | 117,000 | 118,000 | 124,000 | 113,500 | 115,500 | 118,000 | 120,500 | 123,000 | 4-CCC-47(Table 2)                                                                                                         |
| Contact Centre FTE (Managers + Reps only)                            | 27      | 27      | 25      | 27      | 27      | 27      | 27      | 28      | 28      | 28      | 28      | 28      | 4-CCC-47(Table 3)                                                                                                         |
| Contacts per FTE                                                     | 4,796   | 4,722   | 4,260   | 4,093   | 4,333   | 4,370   | 4,593   | 4,054   | 4,125   | 4,214   | 4,304   | 4,393   | Row 2 / 3                                                                                                                 |
| Alectra Customer Care                                                |         |         |         |         |         | 2025A   |         |         |         |         |         |         |                                                                                                                           |
|                                                                      |         |         |         |         |         | 674,325 |         |         |         |         |         |         | EB-2025-0252 / JT2.24 - Total Interactions excluding Chatbot & Automated Moves                                            |
| Contacts (excluding chat bot + automated)                            |         |         |         |         |         |         |         |         |         |         |         |         |                                                                                                                           |
|                                                                      |         |         |         |         |         |         |         |         |         |         |         |         | EB-2025-0252 / JT2.24 - Customer Service Reps + Directors/Managers/Supervisors Only & 4-CCC-43(p.12) - Third Party Agents |
| Contact Centre FTE - Internal (Managers & Reps only) + External Reps |         |         |         |         |         | 126     |         |         |         |         |         |         |                                                                                                                           |
| Contacts per FTE                                                     |         |         |         |         |         | 5,352   |         |         |         |         |         |         | Row 7 / 8                                                                                                                 |
|                                                                      |         |         |         |         |         |         |         |         |         |         |         |         |                                                                                                                           |
| % Difference - Contacts per FTE                                      |         |         |         |         |         | 22.46%  |         |         |         |         |         |         |                                                                                                                           |

1 **Table 9 - % Internal and % Third-Party Contact Center Agents**

|                                                     | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 |
|-----------------------------------------------------|------|------|------|------|------|------|------|------|
| Internal Agents (FTE Within Alectra's Headcount)    | 29   | 59   | 59   | 58   | 60   | 69   | 73   | 78   |
| Third Party Agents (Not Within Alectra's Headcount) | 52   | 61   | 58   | 64   | 62   | 59   | 62   | 57   |
| Total Agent Requirements                            | 81   | 120  | 117  | 122  | 122  | 128  | 135  | 135  |
| % Internal Agents                                   | 36%  | 49%  | 50%  | 48%  | 49%  | 54%  | 54%  | 58%  |
| % External Agents                                   | 64%  | 51%  | 50%  | 52%  | 51%  | 46%  | 46%  | 42%  |

2

3 j) In 2025, third-party agents average \$79,627 annually, while internal CSR/Sr. CSR roles  
4 average \$107,518 including burden costs.

5

6 k) As noted in Table 9 above, third-party agents currently provide approximately 51% of  
7 total agent capacity, declining to 42% by 2031. This shift aligns with Alectra's digital-first  
8 strategy, which is intended to expand customer self-service options for routine  
9 transactions while strengthening internal capacity to manage increasingly complex  
10 inquiries, including net metering, rate options, billing and collections, and EV-related  
11 matters.

12

13 This approach is informed by experience with higher turnover among third-party agents,  
14 which has contributed to increased call transfers, reduced call quality, and lower  
15 customer satisfaction. Accordingly, routine inquiries are primarily assigned to third-party  
16 agents, while more complex matters are handled by internal staff. Through the forecast  
17 period, Alectra expects continued growth in digital self-service to reduce routine inquiry  
18 volumes and lessen reliance on third-party agents relative to internal resources.

19

20 l) Please see Table 10 below for Total Call Hours by Month. Please also see 4.0-VECC-  
21 52 for an update to Exhibit 4 Tab 2 Schedule 7, page 45, Table 4-2-55: Historical and  
22 Forecast Call Volumes, Service Level, AHT and Total Call Hours.

1  
2 b) Table 2 differentiates the postage and labour savings associated with the MyAlectra  
3 portal project and has been updated with 2024 and 2025 actuals.  
4

5 **Table 2: Summary of Expected Benefits for the MyAlectra Portal Project 2024-2031**  
6 **(\$ Millions)**

| Savings Type                                                         | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | Total |
|----------------------------------------------------------------------|------|------|------|------|------|------|------|------|-------|
| Expected reduction in postage cost from increased e-bill penetration | 0.2  | 1.6  | 2.4  | 3.9  | 4.6  | 5.5  | 6.2  | 6.8  | 31.3  |
| Reduction of third-party agents due to automation of moves forms.    | -    | 0    | 0.3  | 0.3  | 0.3  | 0.30 | 0.3  | 0.3  | 1.8   |

7  
8 ii) Table 3 outlines the following assumptions that were used by Alectra to derive the  
9 68.4% e-bill penetration rate. The baseline forecast assumes an average customer  
10 opt-in rate of 3% annually through 2029. Beginning in 2030, a lower adoption rate  
11 was assumed to reflect customer saturation. In addition, a one-time e-bill adoption  
12 campaign was assumed in 2026 targeting paper-bill customers with a MyAlectra  
13 account who are actively utilizing the customer portal. As part of this campaign,  
14 customers would retain the ability to revert to paper billing through the customer  
15 portal. This campaign resulted in a one-time, sustained increase in adoption by  
16 approximately 8%.  
17

18 **Table 3: e-Bill Targets**

| 2024A | 2025A | 2026  | 2027  | 2028  | 2029  | 2030  | 2031  |
|-------|-------|-------|-------|-------|-------|-------|-------|
| 45.2% | 50.5% | 57.8% | 59.8% | 62.9% | 66.0% | 67.2% | 68.4% |

19  
20 iii) Alectra believes that a 68.4% e-bill penetration rate by 2031 represents an  
21 aggressive but achievable target for the utility, with benefits front-loaded in the 2025–  
22 2027-time frame, due to the one-time e-bill adoption campaign planned for 2026,  
23 which is forecast to increase adoption by 8%. Alectra has not assumed any ability to

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CONSUMERS COUNCIL OF CANADA**

**JT-2.28**

Reference: 4-CCC-43 Table 9

Provide the internal FTEs that are directly related to the call centre, including the supervisors and managers.

**RESPONSE:**

In 2025, there were 67 FTEs directly related to the call centre as shown in Table 1. 3 other FTE's in the segment were in roles not directly related to the contact center but are included in the Customer Care segment's total. These roles, support market research and insights, and provide support to the customer ombudsman function. The 8 positions associated with the director, manager, supervisor and specialist line items provide supervisory, work management, and data analytics support to the overall contact center, including third-party agents.

**Table 1 - Contact Centre FTEs**

| FTE Type                                        | 2025      |
|-------------------------------------------------|-----------|
| Customer Service Representatives                | 59        |
| Call Center Director/Manager/Supervisors        | 6         |
| Specialist, Customer Care Reporting & Analytics | 1         |
| Specialist, Workforce Management                | 1         |
| <b>Contact Center Internal FTE's</b>            | <b>67</b> |
| Customer Solutions and Market Insights FTE's    | 3         |
| <b>Customer Care Headcount</b>                  | <b>70</b> |

Alectra does not contemplate increasing the proportion of contact centre operations delivered by third parties, including customer service representative functions or any component of management accountabilities. The operation and oversight of the contact centre are core

- 1 organizational functions and will continue to be primarily performed and maintained by
- 2 internal resources.

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SCHOOL ENERGY COALITION**

**JT-2.24**

Reference: 4-CCC-43 and Table 6

Referring to 4-CCC-43, Table 6, provide the total number of call volumes for 2025.

**RESPONSE:**

Table 1 provides an overview of total customer interactions by type.

**Table 1 - Total Customer Interactions by Type**

| Inquiry Type                  | 2025 Actuals |
|-------------------------------|--------------|
| Customer Call Interactions    | 535,795      |
| Customer E-Mail Interactions  | 138,530      |
| Web Chat (introduced in 2026) | 0            |
| Chat Bot                      | 9,247        |
| Automated moves               | 15,087       |
| Total Customer Inquiries      | 698,659      |

Total 2025 actual customer interactions were 12% lower than the 2025 forecast, due primarily to lower call volumes and automated moves, partially offset by higher email volumes. Below is an explanation of key drivers of the variance.

Call volumes were 18% lower than the 2025 forecast, primarily due to a decline in customer inquiries following the stabilization of the new MyAlectra customer portal, as well as the direct impact of the Canada Post strike. The mail disruption from September to November 2025 prevented the issuance of collection notices and led to the early suspension of residential disconnections in October 2025. This, in turn, significantly reduced collections-related calls, from customers regarding overdue balances, payment arrangements, and reconnections.

1 Higher collection-related call volumes are anticipated in 2026, consistent with increased  
2 customer arrears year-over-year, as customers respond to higher overdue balances and the  
3 resumption of summer disconnection activities.

4

5 Email volumes were 45% higher than the 2025 forecast, driven in part by the mail disruption  
6 and changes to the moves process, which required customers to submit account verification  
7 documents via email when not included on the automated form submission.

8

9 Automated move transactions were 63% lower than the 2025 forecast due to the delay in the  
10 applications implementation from Q1 to Q4. Chat bot functionality was introduced in Q4,  
11 resulting in 9247 customer interactions.

**Table 8 - OEB Annual Assessment Costs**

| Year                                | Amount \$        | Increase %    |
|-------------------------------------|------------------|---------------|
| 2021 Actuals                        | \$252,815        |               |
| 2022 Actuals                        | \$300,630        | 18.9 %        |
| 2023 Actuals                        | \$333,613        | 11.0 %        |
| 2024 Actuals                        | \$383,085        | 14.8 %        |
| 2025 Bridge Year                    | \$404,793        | 5.7 %         |
| 2026 Test Year                      | \$412,889        | 2.0 %         |
| <b>Total Increase 2026 vs. 2021</b> | <b>\$160,074</b> | <b>63.3 %</b> |
| <b>CAGR 2026 vs. 2021</b>           |                  | <b>10.3 %</b> |

- **Consulting Fees (increase of \$162,113)** - BHI leverages consultants to provide expertise not available in-house, and to alleviate resourcing constraints. These costs exclude Technology Consulting Services costs which are captured separately in Section 4.1.2.4 of this Exhibit 4. The primary driver of the increase in these costs is due to an increase in consulting services of \$108,251 beyond inflation in the following departments:
  - Engineering fees associated with design services for non-capital projects which have increased since 2021; and
  - Regulatory and Accounting fees associated with an integrated reporting platform which automates financial statement reporting and rate application filings
- **Postage/Mail Service/Stationery Costs (increase of \$133,841)** - Inflation is the primary driver of this increase. Canada Post mailing costs increased approximately 26% effective January 2025 to better align stamp prices with the rising cost of providing letter mail service to all Canadians. This cost increase is outside of BHI's control but was mitigated by transitioning customers from paper bills to e-billing. The number of customers on e-billing increased from approximately 40% in 2021 to over 45% in 2024, in part due to an e-billing campaign conducted in 2022. More details are provided in Section 4.3.0.6 of this Exhibit 4.
- **Subscriptions/Memberships (increase of \$111,670)** - BHI has several subscriptions and memberships to facilitate management of the business. The main reason for the increase from the 2021 Actuals to the 2026 Test Year is a new subscription which

**1 Table A - 2026-2030 Custom Performance Scorecard Measures (2018-2024 Results)**

| Performance Measure                                                        | Historical Actuals       |       |       |       |       |       |       |
|----------------------------------------------------------------------------|--------------------------|-------|-------|-------|-------|-------|-------|
|                                                                            | 2018                     | 2019  | 2020  | 2021  | 2022  | 2023  | 2024  |
| Contact Centre Satisfaction – Transactional Feedback                       | 78%                      | 87%   | 87%   | 88%   | 84%   | 85%   | 85%   |
| Percentage of Online Billing Accounts                                      | 45.0%                    | 50.3% | 54.8% | 59.5% | 62.3% | 65.3% | 70.2% |
| Customer Participation in Non-Wires Solutions <sup>1</sup>                 | N/A                      | N/A   | N/A   | N/A   | N/A   | N/A   | N/A   |
| All Injury Frequency Rate                                                  | 2.31                     | 0.63  | 0.84  | 1.17  | 0.74  | 1.00  | 1.09  |
| Lost Workday Severity Rate                                                 | 7.52                     | 0.32  | 2.53  | 3.11  | 2.40  | 3.20  | 0.78  |
| Percentage of Distribution Assets in Poor/Very Poor Condition <sup>2</sup> | 17%                      | N/A   | N/A   | N/A   | N/A   | N/A   | 6%    |
| Percentage of Distribution Assets Reaching End of Life <sup>3</sup>        | 18.7%                    | N/A   | N/A   | N/A   | N/A   | N/A   | 54%   |
| Feeders Experiencing Multiple Sustained Interruptions                      | 10                       | 10    | 10    | 5     | 4     | 8     | 5     |
| Worst Performing Feeders                                                   | 5                        | 5     | 8     | 6     | 7     | 6     | 1     |
| Station Load Index (4 or 5) <sup>4</sup>                                   | N/A                      | N/A   | N/A   | N/A   | N/A   | 10    | 7     |
| Incremental System Capacity <sup>5</sup>                                   | N/A                      | N/A   | N/A   | N/A   | N/A   | N/A   | N/A   |
| Distributed Energy Resource Capacity <sup>6</sup>                          | 114                      | 127   | 152   | 163   | 165   | 167   | 169   |
| Cyber Security Program Health <sup>7</sup>                                 | N/A                      | N/A   | N/A   | N/A   | N/A   | N/A   | N/A   |
| Productive Time                                                            | 72%                      | 72%   | 69%   | 73%   | 69%   | 73%   | 71%   |
| Labour Allocation                                                          | Unavailable <sup>8</sup> | 33%   | 37%   | 29%   | 35%   | 35%   | 34%   |

<sup>1</sup> As noted in Section 2.1.3 of Schedule 1-3-2 - Proposed Annual Reporting - 2026-2030, historical data is not available for this measure, in light of the fact that the non-wires solutions programs planned for the upcoming rate term are new.

<sup>2</sup> The historical data reflect Hydro Ottawa's practice to report on asset condition and review the asset base as a whole prior to the beginning of a new five-year distribution rate term, so as to plan investment strategies accordingly.

<sup>3</sup> The historical data reflect Hydro Ottawa's practice to report on assets having reached end of life prior to the beginning of a new five-year distribution rate term, so as to plan investment strategies accordingly. In addition, historically the utility only captured end-of-life based on assets with known ages. As of 2024, the utility is considering the entire asset population.

<sup>4</sup> Historical data prior to 2023 is not available, as Station Load Index was not previously monitored before that time. This is a new measure which Hydro Ottawa is proposing to introduce for the 2026-2030 rate term.

<sup>5</sup> Hydro Ottawa monitors Incremental System Capacity over a five-year period. As stated in Section 1.1 of Schedule 2-5-1 - Distribution System Plan Overview, incremental system capacity added over the 2021-2025 rate term is expected to total 160 MVA.

<sup>6</sup> DER capacity is measured in megawatts (MW).

<sup>7</sup> Historical data is not available, as this is a new measure which Hydro Ottawa is proposing for the 2026-2030 rate term.

<sup>8</sup> Prior to 2019, Labour Allocation was calculated as % of Labour Time on Capital Activities / Total Productive Time.

- d) At the time of response, Oshawa Power had 54.1% of customers on e-billing. Oshawa Power does not believe a reduction is warranted to reflect the updated 2026 e-billing subscriber estimate since the application was only filed 3 months ago.

#### 4-CCC/VECC-130

Ref. 1: Exhibit 4, pp. 44-50, 75, 80

##### Question(s):

- a) (P. 47) Please complete and expand by adding additional lines (as necessary) the following table to show a more detailed breakout of the costs associated with the customer success and collecting program.

| Programs                        | Last Rebasings<br>Year (2021 OEB-<br>Approved) | Historical   |              |              |              | 2025 Bridge<br>Year | 2026 Test<br>Year |
|---------------------------------|------------------------------------------------|--------------|--------------|--------------|--------------|---------------------|-------------------|
|                                 |                                                | 2021 Actuals | 2022 Actuals | 2023 Actuals | 2024 Actuals |                     |                   |
| Customer Success and Collecting | 1,473,746                                      | 1,119,685    | 1,103,787    | 920,832      | 1,375,483    | 1,476,555           | 1,834,959         |
| Salaries / Benefits             |                                                |              |              |              |              |                     |                   |
| Contracted Labour               |                                                |              |              |              |              |                     |                   |
|                                 |                                                |              |              |              |              |                     |                   |

- b) (P. 44) Please provide a summary of the key details with respect to the call centre contract. As part of this response, please provide the term of the contract (i.e., start date and end date), breakdown between fixed and variable pricing, and annual escalation clauses.
- c) Please explain the process Oshawa PUC Networks undertook to enter the call centre contract. As part of the response, please provide details about the RFP, the number of bidders, the selection process, etc.
- d) (P. 44) Please provide the FTE count for call centre employees before and after the outsourcing occurred in 2024. As part of the response, please also provide the proposed number of call center FTEs in 2026. Please also provide the average total direct compensation cost for call centre employees based on the 2026 forecast for these employees.

- Account adjustments and corrections including cancel/re-bills
- Sending preauthorized banking payment files through our third party and CIS vendor
- Billing classification reviews – (Equal Billing, Security Deposit, Rate changes due to consumption)

As customer demographics change, customers are moving towards managing their bills and accounts digitally. Oshawa Power also has a portal managed by London Hydro that supports e-billing efforts and provides online account management for Oshawa Power customers. In fact, 50% of Oshawa Power customers are accessing the portal to view their account and bills. The other 50% of customers continue to access their bills and services via paper as indicated in surveys — preferring the traditional high-touch format of print, in-person service and phone. Conversion to digital is an ongoing focus. While Oshawa Power continues to promote digital channels, it will also look for other cost efficiencies in billing to support customers who prefer traditional channels.

#### Variance Explanations

|                  | Last Rebasing<br>Year (2021 OEB-<br>Approved) | Historical   |              |              |              | 2025 Bridge<br>Year | 2026 Test<br>Year | Variance<br>(2026 Test<br>Year vs. 2021<br>OEB<br>Approved) | Variance<br>(2021 Actuals<br>vs. 2021 OEB<br>Approved) | Variance<br>(2026 Test Year<br>vs. 2024<br>Actuals) |
|------------------|-----------------------------------------------|--------------|--------------|--------------|--------------|---------------------|-------------------|-------------------------------------------------------------|--------------------------------------------------------|-----------------------------------------------------|
|                  |                                               | 2021 Actuals | 2022 Actuals | 2023 Actuals | 2024 Actuals |                     |                   |                                                             |                                                        |                                                     |
| Programs         |                                               |              |              |              |              |                     |                   |                                                             |                                                        |                                                     |
| Customer Billing | 1,124,771                                     | 1,109,647    | 1,125,229    | 1,361,082    | 1,299,464    | 1,589,946           | 1,343,538         | 218,767                                                     | -15,124                                                | 44,075                                              |

#### Test Year 2026 vs. 2021 OEB Approved

The 2026 Test Year increased by \$218,767 compared to 2021 OEB Approved. The annual increases in subcontractor expenses and billing costs, including postage and printing, have grown due to inflation, specifically 2022 to 2023 and 2024 to 2025. This was partially offset because e-billing subscribers have nearly tripled in 2024 (9,164) from 2023 (3,196). As of December 12, 2024, 49% of customers totaling 35,362 receive their bills electronically, with an increase of signups during the Canada Post strike.

#### 2021 Actuals vs. 2021 OEB Approved

No material variances were identified.

#### Test Year 2026 vs. 2024 Actuals

No material variances were identified.

# **TECHNICAL CONFERENCE UNDERTAKING RESPONSES TO** **SCHOOL ENERGY COALITION**

## **UNDERTAKING NO. JT3.7:**

**Reference(s):**           **4-SEC-106**

Ref 4-SEC-106, to provide the percentage of customers on E-billing for 2020 and 2021, and Table 2 as well.

## **RESPONSE:**

**Table 1: Percent of Customers on ebills**

| Year                           | 2020  | 2021  | 2022  | 2023  | 2024  | 2025  | 2026  | 2027  | 2028  | 2029  |
|--------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Percent of customers on ebills | 40.7% | 44.7% | 48.3% | 50.9% | 53.5% | 55.2% | 56.7% | 57.8% | 59.2% | 60.1% |

**Table 2: Estimated Annual Savings per Customer on ebills**

| Year                                            | 2020    | 2021    | 2022    | 2023    | 2024    | 2025    | 2026    | 2027    | 2028    | 2029    |
|-------------------------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Estimated annual savings per customer on ebills | \$10.67 | \$11.09 | \$11.58 | \$11.17 | \$11.53 | \$11.86 | \$12.22 | \$12.58 | \$12.94 | \$13.30 |