



Low-Income Energy Network

C/o Advocacy Centre for Tenants Ontario
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March 17, 2011

Sent by courier and through the Board's web portal

Ms. Kirstin Walli
Board Secretary
P.O. Box 2319
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Re: Customer Service Standards for Natural Gas Distributors (EB-2010-0280)

Dear Ms. Walli:

Enclosed are LIEN's comments on two questions regarding customer service standards for natural gas distributors (EB-2010-0280).

Thank you for the opportunity to make this submission to the Board.

Sincerely,

A handwritten signature in black ink, appearing to read 'Zeenat Bhanji'.

Zeenat Bhanji, Coordinator
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EB-2010–0280 Customer Service Standards for Natural Gas Distributors

Submission of the Low-Income Energy Network on the questions posed by the Board in the letter of January 20, 2011

March 17, 2011

The Low-Income Energy Network (LIEN) represents more than 80 member groups across Ontario. As a network representing the intersection of interests related to low-income consumers and energy and sustainability, LIEN's focus is on reducing the energy bills of all low-income consumers and providing the opportunity for low-income consumers to better manage these energy bills. This helps to ensure that all low-income consumers across Ontario have access to conservation programs, technologies and services as well as conservation education, and realize the environmental, energy and economic benefits associated with the more efficient use of energy.

In the letter of January 20th, 2011, the Ontario Energy Board (OEB) requested input on two questions regarding customer service standards for natural gas distributors. This submission represents LIEN's comments on these questions.

In order to be most helpful to the Board, when this proceeding was announced, LIEN embarked on a survey of its members that are the social service agency providers on the ground that help the customers of the gas distributors across Ontario based on the existing company customers service standards. The survey is not yet complete, but contained within this submission are some preliminary anecdotal results. LIEN anticipates that the survey will be complete in time to respond to specific proposed amendments.

Before proceeding with a consultation on the Board's proposed service standards, LIEN suggests that the Board, as an additional step in the proceeding, require the regulated gas distributors to create a sub-committee of their Consultatives, with LIEN, and others as members, to identify needed changes to their customer service policies and guidelines and to make recommendations to the Board on these changes as well as recommendations on specific customer service standards. The Board would consider these recommendations in the development of the Board's proposed service standards, on which all parties would have an opportunity to comment.

Question 1: Should the Board develop rules which prescribe specific customer service standards to be applied to all rate-regulated distributors? If so, should these standards be analogous to the electricity code provisions for customer service standards? What are the potential advantages and disadvantages of this prescriptive approach?

LIEN supports having appropriate service standards that are fair and transparent, with adequate flexibility to meet the needs of customers, which facilitate the ability of service agencies in communities across Ontario to help customers in need, and that are enforceable by the Board.

LIEN supports the Board in developing certain rules which prescribe specific customer service standards to be applied to all rate-regulated distributors. LIEN anticipates that many of the service standards for rate-regulated gas distributors will be analogous to the electricity code provisions. However, LIEN would like to explore through the Board's next steps in this consultation – the review of proposed customer service standards for regulated gas distributors - whether there are differences that need to be respected between gas and electric distributors and between gas distributors that warrant differences in any gas distributor service standards, before determining whether the electricity and gas service standards need to be identical. While there is merit in having a consistent set of service standards across all rate-regulated distributors as this is easier from a regulatory oversight point of view, LIEN is generally concerned that too prescriptive an approach toward service standards could end up being too rigid, resulting 'in work to rule' implementation, which would diminish the quality of assistance available to customers in need.

Question 2: Should the Board develop rules which require each rate regulated distributor to develop, publish, and adhere to customer service standards for certain prescribed areas of customer service? If so, should the rules include the requirement that gas distributors develop complaint processes which include recourse to the Board in the event disputes are not resolved to the satisfaction of the parties? What are the potential advantages and disadvantages of this less prescriptive approach?

LIEN agrees that each rate-regulated distributor must develop, publish and adhere to customer service standards for certain prescribed areas of customer service. As indicated in their submission, Union Gas publishes Gas Service Guidelines, however, Enbridge does not have an equivalent document, which contains all of their service guidelines. Such a document would assist social agencies in the field that are assisting customers in need, as the policies would be in one easily referenced and accessible place.

Based on LIEN's canvassing of its membership to date, in particular, social agencies delivering services to customers in need, LIEN is of the view that greater transparency is needed regarding regulated gas distributor processes for handling customer issues. For example, transparent guidelines for collection activity/disconnection of service needs to be in place and available to customers and those working to assist these customers. LIEN is also of the view that improvements are needed in disconnection policies and their execution. Our members in the field have voiced complaints about their clients not having received

disconnection notices or having received only 48 hours notice, which is not enough time to come up with funds to resolve the issues.

LIEN suggests that improvements are needed to the existing complaints processes of the regulated gas distributors to make it easier for customer issues to be resolved. LIEN is of the view that there already exists recourse to the Board, however, to ensure clarity, LIEN would not object to an appropriate requirement providing recourse to the Board. LIEN is of the view that Board recourse is a 'last resort', and suggests that the gas distributors consider setting up a sub-committee of the Consultative to provide regular guidance on continual improvement of customer service and related transparency and to address complaints that have resulted in the need to consider going to the Board.

A less prescriptive approach with a balance of Board-required customer service standards and gas distributor policies and guidelines works if all parties operate in good faith and work to achieve continual improvement in an open, transparent, timely and collegial manner. If such an approach were to be adopted, this would provide greater consumer protection, as well as a reduced administrative and regulatory burden.