



uniongas

A Spectra Energy Company

July 18, 2011

Ontario Energy Board
2300 Young Street, Suite 2700
Toronto, Ontario
M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

RE: Union Gas Comments on the Proposed Amendments to the Gas Distribution Access Rule (GDAR) Board File No: EB-2010-0280

Please find attached Union's comments on the Board's proposed customer service amendments to the GDAR.

If you have any questions or concerns, please contact me at 519-436-4521.

Sincerely,

[original signed by]

Marian Redford
Manager, Regulatory Initiatives

1 standards and practices. Union will implement the customer service amendments as set out in
2 Attachment "A" of its February 17, 2011 submission.

3

4 As indicated above, Union supports the proposed GDAR amendments and has no concerns with
5 section 8 of the proposed GDAR. Union, is however, concerned with section 1.4.6 and the
6 proposed in-force date of August 31, 2011. Union is not able to implement the proposed
7 modifications to its policies and practices by August 31, 2011. This is consistent with Union's
8 February 17, 2011 submission where Union indicated that modification of its policies and
9 practices would take six to twelve months. Many of the modifications are significant and require
10 process and system changes which are complex and will take several months to fully implement.

11

12 Accordingly, Union respectfully requests that the in-force date contained in section 1.4.6 be
13 amended to September 30, 2011. By September 30, 2011, Union will document and publish its
14 current customer service standards and practices in a Customer Service Policy. The Customer
15 Service Policy will also provide the timing for the implementation of each of the proposed
16 amendments to Union's customer service standards and practices. All of the amendments will be
17 implemented within 12 months of the proposed September 30, 2011 in-force date.

18

19 **Factors Influencing Implementation Timing**

20 Union's February 17, 2011 submission set out a number of proposed modifications to its current
21 customer service policies and procedures. To implement all of these changes will require major

1 changes to its customer information systems. Those modifications and any other impacted
2 applications will need to be scheduled, initiated and thoroughly tested, before implementation.

3

4 In addition to the information system requirements, the modifications to Union's current
5 customer service policies and procedures will require changes to established business processes.

6 Changes to business processes can impact/involve a number of departments. All modified

7 business processes must be documented and communicated to employees. In some cases,

8 Union's proposed modifications to its customer service policies and procedures (e.g. the

9 acceptance of credit card payments) will require the development of new business processes. As

10 is the case with established business processes, new business processes may involve multiple

11 departments within Union and must be documented and communicated to affected employees.

12

13 Before implementing any of the system or process changes, Union must develop and deliver

14 training to its employees impacted by the changes. This includes Union's Customer Contact

15 Centres' employees who must be prepared to respond to customer inquiries regarding Union's

16 new customer service standards and policies. In addition to Union's Customer Contact Centres'

17 employees, other employees within Union impacted by the changes will also require training.

18 The groups impacted include, but are not limited to, Planning and Dispatch, Utility Services,

19 Meter Reading and Finance.

1 **Description of system and process changes preventing August 31, 2011 implementation**

2 As indicated above, Union will not be able to implement the modifications to its customer
3 service policies and procedures by August 31, 2011. In fact, to fully implement all of the
4 proposed modifications will take up to 12 months. To help the Board better understand the
5 timeframe for full implementation of the system and process changes and to support Union's
6 request for a 12 month implementation period, Union has provided more detailed descriptions of
7 some of the specific system and process changes that prevent August 31, 2011 implementation
8 below.

9

10 *Extended Security Deposit Payments*

11 Significant system changes are required for Union to accept payments of security deposits over a
12 period of up to six months for all customers. Union currently allows customers to make security
13 deposit payments over a number of months. This process, however, is administered on an
14 individual basis by the Customer Service Representative, working with the customer on an
15 exception basis. To allow all customers the option of longer terms, Union must develop an
16 automated process. The development, testing and implementation of an automated process to
17 extend security deposit payments will take several months.

18

19 *Separate Disconnection Notice*

20 In its February 17, 2011 submission, Union proposed to issue a separate notice when
21 disconnecting customers. To be consistent with the disconnection notice of electricity

1 distributors, Union must specify the timing of the disconnection. As Union currently does not
2 specify the timing of the disconnection, Union will require business process changes in its
3 Planning and Dispatch and Customer Care departments to meet the deadlines and requirements
4 included in the disconnection notice. The Planning and Dispatch department must ensure that
5 Utility Service Representatives are available in remote locations on the date specified in the
6 notice to turn the meter off. Utility Service Representatives must also be available to reconnect
7 the customer within 24 hours of the customer paying the outstanding balance on the bill or
8 entering into a payment arrangement. The business process changes associated with the
9 disconnection notice are extensive and will require increased coordination between the Contact
10 Centre, Billing Support, Planning and Dispatch, and Utility Service representatives. The new
11 process must be developed, documented, and tested before implementation. Given the number of
12 departments involved and the level of coordination required, Union anticipates that this process
13 change to take a number of months to fully implement.

14

15 *Payment by Credit Card*

16 Currently Union does not accept credit card payments. To provide for a credit card payment
17 alternative, Union must first select a vendor that will accept the credit card payments from
18 customers on Union's behalf. The vendor will be selected through a formal "Request for
19 Proposal" process. Once a vendor is selected, it will take three to six months to make the
20 necessary system changes to accept payment by credit cards, as the implementation period
21 recommended by vendors.

1 **Conclusion**

2 As indicated above, Union is not able to implement all of the modifications to customer service
3 policies and practices as proposed in its February 17, 2011 submission. Union respectfully
4 requests that the in-force date contained in section 1.4.6 be amended to September 30, 2011. By
5 September 30, 2011, Union will document and publish its current customer service standards and
6 practices in a Customer Service Policy. The Customer Service Policy will also provide the
7 timing for the implementation of each of the proposed amendments to Union’s customer service
8 standards and practices. All of the amendments will implemented within 12 months of the
9 proposed September 30, 2011 in-force date.

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11 Finally, in its June 29, 2011 letter, the Board states that it “anticipates that gas distributors will
12 incur costs in modifying their customer service-related standards and practices”. As noted in its
13 February 17, 2011 submission, Union requests that all one-time and ongoing costs resulting from
14 modifying Union’s current policies and practices be recoverable from ratepayers. Although the
15 costs will be less than a more prescriptive approach, Union will still incur costs to comply with
16 the revised GDAR. Union proposes that such costs be tracked in the Gas Distribution Access
17 Rule (GDAR) Costs deferral account for later disposition.