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EMAILED AND FILED VIA RESS

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON M4P 1E4

Dear Ms Walli:

Re: EB-2010-0280: Consultation on Low-Income Gas Customer Service Standards

We represent Enbridge Gas Distribution Inc. ("Enbridge", or the "Company").

On March 26, 2012, Enbridge filed submissions in this matter, in response to the Board's March 1, 2012 Notice. Those submissions set out Enbridge's position on certain of its customer service standards that had been identified by the Board as potential areas of concern in relation to low-income customers.

Since the time that Enbridge filed its submissions, the Company has continued to consider its position on late payment penalties ("LPPs") for low-income customers on arrears payment agreements. This was the one area where Enbridge had declined to adopt the Board's favoured approach.

Enbridge has reconsidered its position and is prepared to adopt the Board's preferred approach to this issue, and agree not to charge LPPs for qualified low-income customers once they have entered into an arrears payment agreement. This would align Enbridge's policy with the approach that Union Gas has indicated that it would adopt, as seen in the Union Gas submissions. In the result, the customer service policies for low-income customers of both Enbridge and Union Gas will be substantially similar.

The specifics of Enbridge's proposed changes to its customer service policies to reflect the foregoing are as follow.

Enbridge is prepared to amend its LPP requirements for low-income customers and waive LPPs for low-income customers who enter into an arrears payment agreement. LPPs will be applicable to any outstanding balance up to the time that the low-income customer enters into an arrears agreement. Once enrolled in an arrears payment agreement, LPP will no longer be charged on the amounts associated with the payment agreement for the applicable low-income customer. Should the low-income customer cancel the arrears payment agreement or default on the arrears payment

agreement, LPPs will become applicable again. In the event that a low-income customer defaults on an arrears payment agreement, then the option to have LPP waived with a future arrears payment agreement will no longer be available for that low-income customer. Enbridge will, however, continue to maintain its flexibility in considering individual customers' circumstances in offering arrears payment agreements. In the event that a low-income customer successfully completes a payment agreement, Enbridge will continue to allow LPPs to be waived for that customer on any future arrears payment agreements for a period of 2 years, at which time that customer must be re-assessed as low-income.

Enbridge will require additional time to implement this LPP change, given that it will require a significant change to Enbridge's CIS and will require extensive testing. Enbridge is proposing the implementation date be on or before January 1, 2013.

There will be costs and other financial impacts associated with implementing these additional changes to Enbridge's customer service policies. Enbridge intends to record its actual costs related to the implementation as well as any ongoing operational and LPP impacts to the Gas Distribution Access Rule Costs Deferral Account ("GDARCD") in the same manner that the Company intends to capture the impacts from the other customer service rule changes. The Company will seek the clearance of those amounts at the same time as other deferral and variance accounts are addressed.

Should you have any questions, please do not hesitate to contact me.

Yours very truly,

AIRD & BERLIS LLP



David Stevens

cc. Takis Plagiannakos and John Vratsidis, Ontario Energy Board staff
Enbridge Gas Distribution and parties listed in EB-2010-0280

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