



Low-Income Energy Network

Sent by courier and through the Board's web portal

January 18, 2013

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

Dear Ms. Walli:

Re: Notice of Proposal to Amend a Rule: Customer Service Amendments to the Natural Gas Reporting and Record Keeping Requirements EB-2010-0280

The Low-Income Energy Network (LIEN) represents 90 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 low-income consumers the opportunity to better manage their 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 from generation to end-use.

Summary of LIEN Submission

LIEN continues to be supportive of a less prescriptive approach provided that all of the conditions below are met:

- Customer service standards are fair and enforceable
- There is consistency in standards across the regulated gas distributors, where appropriate, to ensure a reasonable balance between level of service needed and costs to provide this service
- There are appropriate metrics and reporting in place to track regulated distributor performance regarding the adherence to the standards. There is consultation with stakeholders on the metrics and reporting
- Regulated gas distributors consult annually with stakeholders on implementation of their customer service policies with a view to achieving continual improvement

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- The Board provides for a detailed review of customer service policies and associated reporting and record keeping requirements at least every 5 years, or consistent with the length of time of the regulatory framework for Incentive Regulation (IR).

LIEN concurs with the Board's proposed customer service amendments to the natural gas reporting and record keeping requirements and proposes some additional amendments for inclusion in the Rule. The Board's proposed amendments provide appropriate metrics and major progress on reporting of regulated distributor performance. LIEN is strongly supportive of the Board's focus on encouraging distributors to work more proactively with disconnected residential customers to have service restored.

LIEN's proposed amendments are targeted additions, which will add important granularity to the tracking of the performance of customer services. This is necessary to get a sharper picture of the level and quality of service provided to both residential and low-income customers in order to assess future levels of service needs, for example, the appropriate level of LEAP funding per participant. The LIEN proposed amendments also will provide a better understanding of the pattern of arrears of customers and this should lead to improved arrears management agreements.

LIEN appreciates the participation of the non-regulated gas distributors in the Board's customer service rule development process and the distributors' voluntary adoption of Board reporting and record keeping requirements.

LIEN recommends that gas distributors consult annually with stakeholders on implementation of their customer service policies with a view to achieving continual improvement.

LIEN Submission Details

Submission details are presented in order of the proposed italicized amendments provided by the Board. LIEN supports all of the Board proposed amendments. LIEN's focus in its submission details presented below is on proposed additions to the Board amendments.

1. Section 2.1.18 (b) – Disconnections for Non-Payment

In order to track whether disconnection could be avoided more effectively through arrears management agreements or whether some other steps may be necessary, LIEN recommends the following additions:

- vii. Number of residential customer accounts disconnected for non-payment once during the year where the customer has an arrears payment agreement
- viii. Number of low-income customer accounts disconnected for non-payment once during the year where the customer has an arrears payment agreement

- vix. Number of residential customer accounts disconnected for non-payment more than once during the year where the customer has an arrears payment agreement
- vx. Number of low-income customer accounts disconnected for non-payment more than once during the year where the customer has an arrears payment agreement

- vxi. Number of residential customer accounts disconnected for non-payment more than once during the year where the customer did not have an arrears payment agreement in place after the first disconnection

vxii. Number of low-income customer accounts disconnected for non-payment more than once during the year where the customer did not have an arrears payment agreement in place after the first disconnection

2. Section 2.1.18 (e) – Arrears Payment Agreements

In order to track the level of arrears per customer and the effectiveness of arrears payment agreements in their management, which will be of value in determining opportunities for continual improvement as well as the need for additional customer assistance, LIEN recommends the following additions:

vix. Average amount of arrears per residential customer account with an arrears payment agreement

vx. Average amount of arrears per low-income customer account with an arrears payment agreement

vxi. Average length of time for repayment by residential customers of the arrears

vxii. Average length of time for repayment by low-income customers of the arrears

vxiii. Number of residential customer requests for arrears payment agreements that were declined and reasons for decline by category

vxiiii. Number of low-income customer requests for arrears payment agreements that were declined and reasons for decline by category

vxiix. Number of residential customers with an arrears payment agreement that participated in a DSM program

vxx. Number of low-income customers with an arrears payment agreement that participated in a DSM program

vxxi. Number of residential customers with an arrears payment agreement whose security deposits were waived in whole or in part

vxxii. Number of low-income customers with an arrears payment agreement whose security deposits were waived in whole or in part

vxxiii. Number of residential customers with an arrears payment agreement whose late payment fees were waived

vxxiv. Number of low-income customers with an arrears payment agreement whose late payment fees were waived

3. Consultation Annually with Stakeholders on Customer Service Policy

Consistent with a less prescriptive approach, LIEN is not recommending a new section in the Rule, which requires the regulated gas distributors to report on the number of meetings held with stakeholders to discuss implementation of their customer service policies and opportunities for continual improvement. Instead, LIEN urges the Board to encourage the gas distributors to hold such consultations.

LIEN is of the view that such consultations could be achieved with limited cost and effort. For example, it would be efficient and cost-effective if an additional day were added before or after one of the regular Union-Enbridge Low-Income Consultative meetings.

Several LIEN members travel from outside of the Toronto area to attend the Low-Income Consultative meeting and these representatives would also participate in the meeting regarding customer service policy implementation and associated continual improvement.

Sincerely,



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