



uniongas

A Spectra Energy Company

January 18, 2013

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

RE: EB-2010-0280 – Union Gas Limited – Submission on Customer Service Amendments to the Natural Gas Reporting and Record Keeping Requirements

Dear Ms. Walli:

On December 13, 2012 the Ontario Energy Board gave notice under section 45 of the Ontario Energy Board Act, 1998 of proposed customer service-related amendments to the Natural Gas Reporting and Record Keeping Requirements Rule for Gas Utilities (“Gas RRR”). The proposed amendments will require rate-regulated gas distributors to report on their application of the updated residential and eligible Low-income customer service policies that they committed to in the EB-2010-0280 consultations. Interested parties were invited to provide comments on the proposed amendments by January 18, 2013. Union Gas Ltd. (“Union”) supports most of the proposed customer service-related amendments to the Gas RRR. Where Union does not support the amendments an explanation has been provided below. Union can comply with all other amendments to the Gas RRR as proposed.

Section 4.2 Customer Service-Related Complaints to be Reported

The Board has proposed that gas distributors report on the number of customer service-related complaints received during the course of the year, from residential and eligible low-income customers, subdivided into the categories identified by the Board in its proposed amendments to the Gas RRR.

Union currently records complaints based on more general topics such as moving, billing and payment arrangements. System and process changes are required to separate complaints between residential and Low-income customers and categorize them as identified by the Board. Union requires time to implement these changes and may not be able to categorize complaints as requested by the Board until October 1, 2013.

In addition to the inability to currently track customer complaints Union notes the following:

- 2) Billing Adjustments:
 - i) Number c) is duplicative of a) and b);
 - ii) It is possible that there may be multiple billing adjustments required to correct an issue. Union proposes tracking the number of complaints regarding billings adjustments on a per customer basis.

- 9) Opening and Closing Accounts:
 - i) Tracking against the number of accounts opened would not be a meaningful comparison as landlord/tenants form only a portion of the new accounts opened each year. Union proposes no tracking of the number of residential accounts opened.

Section 4.3 Customer Service-Related Enquiries to be Reported

The Board has proposed that gas distributors report the total number of customer service-related enquiries distributors received during the year separated between residential and eligible Low-income customers. The Board has also proposed that customer service-related enquiries be reported using the same categories identified for complaints reporting in Section 4.2.

Union's contact centre technology cannot currently support the requirements under Section 4.3. Union's information technology can only report total enquiries for all customers (residential and small commercial) and cannot currently separate enquiries into the categories identified by the Board. The above reporting would require significant and costly process and system changes. Union requests reporting under Section 4.3 be total customer enquiries, including residential and small commercial.

Section 5.0 Baseline Data

As per the Board's Notice, Union can provide baseline data for 2011 and 2012 for all items set out in Section 3, aside from arrears payment agreements data.

Implementation Costs

As stated in previous submissions, Union will track any costs incurred for system and process changes required to modify its customer service policies in the Gas Distribution Access Rule (GDAR) Costs deferral account for future disposition. This will include costs incurred for Union to report on the proposed customer service-related amendments to the Gas RRR. In particular, the cost for system and process changes required for Union to report information on the number of customer service-related complaints raised with a utility during the year separated between residential and eligible Low-income is unknown. Union is also monitoring potential ongoing operational and lost revenue impacts and if significant, Union will request recovery through the GDAR Costs deferral account.

9.0 Coming into Force and Initial Filing Date

The Board proposes that Enbridge and Union start collecting information in respect of the proposed Gas RRR amendments no later than July 1, 2013 and file their new customer service data as part of the regular April 2014 RRR filing. Union can comply with the proposed dates with the exceptions noted below. Significant process and system changes are required to separate customer service-related complaints between residential and Low-income customers and categorize them as the Board requires under Section 4.2. To implement the required process and system changes, Union requests that the collection of the information in respect to section 4.2 start October 1, 2013, rather than July 1, 2013. For section 4.3, Union can comply with the proposed filing dates if reporting is on total enquiries for all customers (residential and small commercial).

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

Yours truly,

[Original signed by]

Marian Redford
Manager, Regulatory Initiatives

cc: Crawford Smith (Torys)
EB-2010-0280 Intervenors