



June 27, 2017

Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli

Re: EB-2017-0183: Review of Customer Service Rules

The Electricity Distributors Association (EDA) represents the voice of Ontario's local electricity distribution sector, which safely and reliably delivers power to millions of homes, businesses and public institutions. The distribution sector as a whole employs 10,000 people directly, holds \$19 billion in assets, and makes hundreds of millions of dollars annually in direct contributions to both municipal and provincial revenues.

The EDA thanks the Ontario Energy Board (OEB) for the opportunity to comment on the Review of Customer Service Rules (CSR). In addition to this cover letter, the EDA is providing responses to the 14 questions set out in the May 25, 2017 letter (please see Attachment A) and comments on the recently concluded Moratorium on Disconnection of Residential customers for non-payment (please see Attachment B).

The Moratorium temporarily over-rode LDCs' ability to provide service at commercial terms and conditions without providing an adequate suite of compensating strategies and while continuing LDCs' pre-Moratorium financial obligations to channel partners, such as the IESO. Examples of compensating strategies include the ongoing ability to deploy Load Limiters, access to alternate sources of payment, and altered rates capable of appropriately compensating distributors for the costs and risks that incurred and managed throughout the Moratorium's operation. The EDA is cognizant that among the OEB's legislated objectives is the facilitation of the maintenance of a financially viable electricity industry. The EDA points out that the provision of appropriate strategies would have supported the OEB in fulfilling this and its other legislated objectives. Attachment B to this letter expands on and analyzes the Moratorium. The EDA looks forward to

working with government, customers, the regulator, agencies and other impacted stakeholders as the full impact of the Moratorium unfolds to fully analyze its operations and outcomes.

Thank you for the opportunity to contribute to this initiative. If you have any questions or comments on these submissions please refer them to Kathi Farmer, Senior Regulatory Affairs Advisor at kfarmer@eda-on.ca or at 905.265.5333.

Sincerely

A handwritten signature in black ink, appearing to read "Teresa Sarkesian". The signature is fluid and cursive, with a long horizontal stroke at the end.

Teresa Sarkesian
President and Chief Executive Officer

Encl.