

MC-2018-68



⊖ MC-DP C:SNAP

January 11, 2018

Minister Glenn Thibault,
Ministry of Energy
4th Floor, Hearst Block
900 Bay Street
Toronto ON M7A 2E1

P.L. Brantford Power CEO
advises it will not be able
Sent via courier
implement the new bill
presentation requirements
because of new customer
information system
project.
S.LDC.



Dear Minister Thibault,

RE: Deferral of OFHP Bill Messaging

Brantford Power Inc. ("BPI") is a licensed distribution company operating in Brantford, Ontario serving almost 40,000 commercial, residential and industrial customers. BPI is currently in the process of modernizing its information systems, an undertaking which was initiated in 2013 with its System Integration Study. As a result of the study, BPI has successfully completed its transition to a new Financial Information System. BPI's current system project is the implementation of a new Customer Information System ("CIS"). At this time, the project procurement, discovery and contracting stages are substantially complete with project planning to be finalized imminently and project kickoff meetings at the end of January 2018.

BPI is investing in this new system in order to maintain its high levels of customer service, its compliance with various policy and reporting obligations, and to provide enhanced functionality for customers in the future.

One of the key expectations of BPI's customers is to receive a correct and timely bill, and as such BPI is planning its CIS transition with a high priority assigned to customer billing accuracy.

BPI has planned its staffing levels for 2018 to ensure continued operability of the "day to day" customer service and billing functions simultaneous with the incremental activities related to the new CIS implementation such as system design, data conversion, new integrations, system configuration, testing and training. Given this



context, BPI has reviewed the updated Ontario Regulation 196/17: Invoicing Requirements (the “Regulation”), which was released on December 20, 2017 and is effective January 1, 2018. BPI has been monitoring the development of this regulation update through the regulatory consultation process, and has conducted meetings to determine what will be required to implement the new bill messaging both internally and with external service providers.

BPI has worked with its current CIS vendor to estimate a timeline for the delivery of programming from the vendor to BPI. The vendor anticipates programming for the first phase of the solution can be delivered by mid-February. After the delivery of the vendor programming, BPI must install additional internal programming related to BPI’s current CIS setup, followed by extensive testing and further work with its bill print vendor. This work effort would be expected to span until the implementation deadline of March 31, 2018. These tasks would be completed primarily by key resources on BPI’s Information Technology and Billing and Settlement teams.

During the same period of mid-February to March 31, 2018, the same key Information Technology and Billing staff are scheduled to be extensively involved in the “Design Phase” of the CIS conversion project, including data conversion, software configuration, and the development of interface and customization specification documents.

As a result, BPI has determined it will not be able to implement the new bill presentation requirements and keep its CIS implementation project on schedule. To complete the necessary work, BPI would have to delay its CIS implementation by several months, which would mean a deferred customer benefit as well as additional costs as project resources are kept on longer than expected.

Under section 3. (1) of the Regulation, the Minister may provide written notice to an electricity vendor permitting the use of alternate bill wording “ for technical or operational reasons”... “[if] it would be impossible, impractical or unreasonably difficult” for an electricity vendor to use the wording specified in the regulation.

BPI believes its situation, as described above, makes it impractical and unreasonably difficult to implement the specified wording for technical and operational reasons, as described above. BPI therefore proposes to use the prior bill messaging requirements:



"Ontario's Fair Hydro Plan substantially lowers electricity bills for typical residential consumers. This includes the eight per cent rebate introduced in January 2017, and builds on previous initiatives to deliver broad-based relief on all electricity bills."

BPI proposes to do this until the first set of bills which are issued from its new CIS. This is currently planned to be ready in first quarter of 2019, however this date is subject to change with the project's progress, and keeping in mind BPI's key priority of a seamless billing transition with no customer issues.

BPI trusts you will find the rationale for this deferral satisfactory and would be happy to answer questions should you have any.

Sincerely,

Paul Kwasnik
CEO/President
Brantford Power Inc.

84 Market St., P.O. Box 308
Brantford, ON N3T 5N8

Telephone: (519) 751-3522 Ext 5487
Email: pkwasnik@brantford.ca