

Ontario Energy Board
September 30, 2005

Staff Proposal

Regarding a Future Proposed Rule for
Natural Gas Distributor Service Quality
Requirements

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Introduction

The Natural Gas Forum (NGF) Report issued by the Ontario Energy Board (the Board) on March 30, 2005 proposes to move towards implementing a multi-year incentive ratemaking (IR) framework for natural gas utilities. The Board identified quality of service as one of the necessary criteria for establishing an incentive ratemaking framework. The Board expects that Service Quality Requirements (SQRs) would help to ensure that cost saving initiatives are not implemented at the expense of either customer service or the safe operation of the distribution system. The SQRs will not incorporate direct financial incentives or penalties. The Board proposes to implement a service quality framework through its rule making authority under section 44 of the *Ontario Energy Board Act, 1998* (the Act). Natural gas utilities will be required to comply with the rule and any non-compliance on the part of the natural gas utilities will be subject to the Board's compliance process.

Board staff (staff) has prepared this report on natural gas SQRs (the Report) in order to solicit comments on a proposal that will form the basis of the formal rule that will be released for comment in accordance with section 45 of the Act (the Proposal). A staff discussion paper entitled *Staff Report on Ontario Gas Distributor Service Quality Regulation* was released on July 29, 2005 (the Discussion Paper) and the Board subsequently held consultations on that paper in late August and September, 2005. This Report presents a general overview of current concerns and issues that consumers have in relation to the service quality of natural gas utilities in Ontario. These consumer concerns and issues were used in order to provide some context for the Proposal attached as Appendix 1 to this Report. For a more detailed discussion of the historical experience in Ontario's energy sector with monitoring service quality performance within an incentive based ratemaking framework for electricity and gas distributors, please see the Discussion Paper. The Discussion Paper also contains a brief summary of best practices in service quality regulation from other jurisdictions.

Following its review of comments received on this Proposal, the Board intends to issue a proposed rule in early December, along with an analysis of the benefits and costs of the proposed rule.

Overview of SQRs in the Context of Incentive Regulation

In the NGF Report, the Board proposed that a multi-year incentive ratemaking framework for gas distributors be developed. As part of the framework, the Board determined that there was a need to establish service quality measures, standards and reporting mechanisms as a means to ensure that cost saving

initiatives would not be implemented at the expense of customer service or the safe operation of the distribution system.

The Board concluded that service quality standards should not be developed on a utility specific basis within the rate setting process. Instead, the Board believes that service quality performance should be part of a broader framework for the entire gas sector. The framework will be implemented through the establishment of SQRs under the Board's rule making authority.

Section 44(1) of the Act states that the Board may make rules:

- (d) establishing conditions of access to transmission, distribution and storage services provided by a gas transmitter, gas distributor or storage company...
- (f) requiring and providing for the making of returns, statements or reports by any class of gas transmitters, gas distributors or storage companies relating to the transmission, distribution, storage or sale of gas, in such form and containing such matters and verified in such manner as the rule may provide.

The focus of this paper and staff's proposal is on consumer satisfaction rather than system performance for two reasons: (1) there is no evidence that Ontario's natural gas utilities have failed to provide a satisfactory level of reliability; and (2) many system performance issues are regulated by other means (i.e., the Technical Standards and Safety Authority (TSSA)).

Consumer satisfaction is an issue in the regulation of natural monopolies such as natural gas utilities because there is no competitive market for the service; therefore, even if a consumer is dissatisfied with the customer service provided to them, there is no other company to which the consumer could switch. While for market goods there may be issues related to proper representations and warranties (e.g. in relation to truth in advertizing), consumers' satisfaction is reflected in the demand for the good. This is not the case for natural gas utilities. While the maintenance of good service has always been a concern of regulators, the need to impose regulatory requirements for service quality takes on greater importance in the context of an incentive regulation regime. Consequently, staff is now seeking the advice of natural gas consumers about the kinds of SQRs that best reflect their satisfaction or dissatisfaction with the service of the utilities.

The measures proposed in Appendix 1 are based on the following inputs:

- staff review of consumer concerns received by the Board;
- existing electricity service quality indicators;
- the experience of other jurisdictions; and,
- staff's assessment of the costs and benefits of more or less stringent SQRs based on the previous consultations.

The rationale for staff's choices for the particular measures put forward in Appendix 1 is explained below.

Consultation on the Discussion Paper

Once staff sent out the Discussion paper, all participants in the NGF were invited to attend a consultation on the Discussion Paper. The consultation meetings were held on August 22 and 23, 2005. Appendix 2 provides a list of the attendees. A follow up half-day meeting was held on September 12, 2005 to discuss additional information provided by Enbridge Gas Distribution (Enbridge) and Union Gas (Union) regarding the measures and costs.

The initial consultation meetings focused on the following list of questions (which were identified in the Discussion Paper):

- What aspects of service quality should be considered as standards for the framework? Which aspects should be excluded?
- What differences exist between the standards currently monitored by distributors?
- What standards should be included as a service quality requirement?
- How should the standards be defined and measured?
- What are the costs and benefits of the standards to consumers and to distributors?
- What are the barriers to implementing the standards and how can they be overcome?

Review of Types of SQRs

Staff has identified SQRs based on consumer concerns and issues as well as, the existing standards and practices used by electricity and natural gas distributors in Ontario and other jurisdictions.

Consumer Concerns

A review of customer comments and complaints logged with the Board between 2003 and 2004 identified the following common issues:

- slow telephone response times;
- no response to telephone or written complaints;
- failure to obtain regular meter reads;
- inaccurate billing;
- long payment processing times;

- long reconnection times, specifically after payment is made;
- long new connection times;
- slow response to gas emergencies; and
- missed service appointments.

Existing Natural Gas Utility Practice

Natural gas distributors have internal reporting mechanisms in place to ensure that minimum service levels are met. These standards include:

- minimum telephone response times;
- number of meters read within a period of time;
- minimum emergency response times;
- minimum gas locate appointment times;
- minimum customer complaint response times; and
- minimum enquiry response times.

Existing Electricity Utility Practice

The Board recognized the importance of service quality regulation when developing the Performance Based Rate Regulation (PBR) for electricity distributors within Ontario (which was implemented in 2000). Reporting requirements were implemented within the Board's Electricity Reporting and Record Keeping Requirements (RRR) and are a condition of electricity distributors' licences. The RRR required electricity distributors to report a yearly average of institutionalized performance results. These requirements were later amended to require distributors to report monthly results for the previous year with their annual filings. The approved list of service quality indicators is attached as Appendix 3 to this Report.

Other Jurisdictions

The Discussion Paper discussed the consumer-focused service quality standards currently established for gas distributors in other jurisdictions, mainly the United Kingdom, Australia, Pennsylvania and Alberta. The standards that are proposed in Appendix 1 are those staff has identified as those that may be considered to be the most relevant to Ontario. Staff noted considerable similarities and consistencies among the various jurisdictions in the types of standards measured. A comparative chart outlining the standards and measures of each jurisdiction is attached as Appendix 4 to this Report.

How Staff Developed the Proposal

As a result of the previous consultations, staff recognized the need to ensure that: standards and measurement techniques are clearly and consistently defined across the sector; standards are relevant and responsive to the trends and experiences within the sector; and clear direction is provided to the sector with regard to the Board's response to below-standard performance.

On the basis of the review of both Ontario's experience and that of other jurisdictions in the natural gas and electricity sectors as well as in other jurisdictions, the Discussion Paper identified the following ten areas in which appropriate SQRs may be developed:

1. Telephone Answering Performance;
2. Billing Performance;
3. Payment Processing Performance;
4. Meter Reading Performance;
5. Service Appointment Response Times;
6. Reconnection Performance;
7. New Connection Performance;
8. Gas Locate Performance;
9. Gas Emergency Performance; and,
10. Customer Complaint Response Times.

During the consultation meetings each area listed above was discussed in terms of: its relevance to a regime of incentive regulation; measurement issues; the balance of benefits and costs; and the interrelationship among categories (i.e., appointments kept and meter reads). From these discussions, staff concluded that SQRs for performance in the following areas are not warranted at the present time:

- Payment Processing;
- Gas Locate; and,
- New Connection.

The reasons for reaching this conclusion stem from the nature of incentive ratemaking. Under incentive ratemaking, the primary concern is that the monopoly provider will achieve cost reductions at the expense of quality of service. Where the utility has a strong incentive to provide high levels of performance without additional regulatory standards, it is better to allow the utility the flexibility to adjust its management and operational processes appropriately. In the three above-mentioned areas, the comments received from stakeholders indicated that internal incentives to perform appear to be sufficient. It was felt that the benefits of regulation would not outweigh the constraints imposed. In addition, gas line locates are subject to regulation by the TSSA and the inclusion of a SQRs measure under the Board's authority would duplicate an existing regulatory practice.

In general, there is a great deal of similarity between Enbridge and Union with respect to existing informal performance metrics for most of the seven remaining categories. Appendix 5 to this Report provides a comparison of the current indicators used by Enbridge and Union that could form the basis of future SQRs. The major difference between the two utilities concerns telephone answering. Union has a standard of 65% of incoming calls contacting a live voice within 20 seconds whereas Enbridge's standard is 75% of calls being connected to a live

person within 30 seconds. The utilities also have different ways of defining the denominator in the percentage figure (i.e., it depends on whether certain types of calls are included in the measure). For example, Union includes collections calls in its target percentage but Enbridge does not.

In the Proposal provided in Appendix 1, staff has attempted to address both of these issues. The inclusion of collections calls in the measure appears more appropriate than not including them. Furthermore, the costs associated with a slightly lower average percentage of callers who get connected to a live voice within a shorter timeframe seems to be roughly equivalent to the higher percentage of callers who get connected to a live person within a longer timeframe. There does not appear to be any evidence that a more stringent requirement would be worth the extra costs.

Conclusion

The Board has indicated that it will act on the recommendations of the NGF Report, including the establishment of SQRs for natural gas distributors, in advance of setting an incentive regulation framework. The purpose of this Report is to elicit feedback from stakeholders to staff's Proposal for the SQRs. After reviewing the written responses to this Proposal, the Board intends to issue a proposed rule under sections 44 and 45 of the Act for formal comment. As prescribed for by the Act, the notice that accompanies the proposed rule will include a description of the anticipated benefits and costs of the proposed rule. In this regard, staff anticipates that the natural gas distributors will attempt to quantify the likely costs of implementing SQRs that are more stringent than current practices. The Board has set a deadline of March 31, 2006 for implementation of the rule.

In particular, staff would appreciate comments on the following questions:

1. Are there other measures not included in the Proposal attached as Appendix 1 to this Report that should be included in the Board rule? If so, what should they be?; and,
2. Are the measures proposed in the Proposal appropriate or should they be modified? If so, what modifications should be made?

Attachments

Appendix 1 –Proposal for Natural Gas Service Quality Requirements

Appendix 2 – Attendees of Consultation Meetings Held on August 22 and 23, 2005

Appendix 3 – Ontario Electricity Distributor Service Quality Indicators

Appendix 4 – Comparison of Jurisdictions

Appendix 5 – Comparison of Enbridge and Union's Current Standards

Appendix 1

Staff Proposal for Natural Gas Service Quality Requirements Performance and Measurements

1. General Provisions

The purpose of this document is to establish performance standards and measurements for the natural gas industry in Ontario.

2. Identifying Service Quality Requirements

A gas distributor must observe and track its performance with respect to the following list of service quality requirements:

- a) Telephone Answering Performance;
- b) Billing Performance;
- c) Meter Reading Performance;
- d) Service Appointment Response Times;
- e) Gas Emergency Response;
- f) Customer Complaint (Written) Response; and
- g) Disconnection/Reconnection.

3. Definitions and Performance Measurements

3.1 Telephone Answering Performance

Telephone Answering Performance is a service quality indicator that is based on a centralized facility established or outsourced to handle calls and other inquiries from customers. The measurement of this requirement will include the following categories of calls; billing; collections; emergencies; and meter appointments.

Data for the call answer performance measures shall be obtained by monitoring calls on the distributors' telephone systems including the Interactive Voice Response (IVR) system.

3.1.1 Call Answering Service Level

The percentage of all callers reaching a live voice (i.e., a Call Center representative) within 20 seconds. This measure will track the percentage of attempted calls that successfully reach a live operator within 20 seconds. The time measurement will begin once the caller requests to leave the IVR system and speak to a live operator. The operator must be ready to accept calls and to provide information.

This measurement will be based on a yearly average calculated as follows:

$$\frac{\text{Number of calls reaching a distributor's live voice operator within 20 seconds}}{\text{Number of attempts to reach a distributor's live representative}}$$

The yearly performance standard for the Call Answering Service Level shall be 65% with a minimum monthly standard of 40%. The standard shall not fall below either the monthly or yearly levels.

3.1.2 Abandon Rate

The abandon rate means the percentage of callers who hang up once they are connected to the IVR. This measure will track the percentage of callers that hang up when they are in the IVR system before they reach a live operator. This measurement will be based on a yearly average calculated as follows:

$$\frac{\text{Number of calls abandoned once within the IVR}}{\text{Total number of calls}}$$

The performance for this standard shall not exceed 5%.

3.2 Billing Performance

The billing performance standard is a quality assurance standard. The standard will require gas distributors to have a verifiable quality assurance program in place. No specific metric is attached to this requirement.

3.2.1 Audits

Distributors must audit their billing data for accuracy. Manual checks must be done to validate data when meter reads fall outside criteria for excessively high or low usage. In addition, the quality assurance program must include random audits of data quality and billing accuracy.

3.3 Meter Reading Performance

A distributor may choose to estimate the meter read for various reasons which may include limited access (e.g., a customer has an inside meter or the access to the meter is restricted) and the expense of actual meter reads. It is cost prohibitive to get actual meter reads each month. As a result, this measurement is put in place to set out the minimum requirements for meter reads.

3.3.1 Meter Reading Performance Measurement

The meter reading performance measurement requirement will measure the percentage of meters not read within four consecutive months. This will not include callers who call in their meter reads. The measurement will be calculated as follows:

$$\frac{\text{Number of estimated meter reads not read in 4 consecutive months}}{\text{Total number of meters read}}$$

This measurement shall not exceed 0.2% on a yearly basis.

3.4 Service Appointment Response Time

A distributor will ensure that appointment times are scheduled and, if requested, a customer shall be given an appointment time with a four hour window (i.e., morning, afternoon, or evening). This measurement will track the accuracy of response to these appointment times. Only the appointments that require the customer's presence will be included in this measurement.

3.4.1 Completion of Service Within the Designated Time Period

This measurement will identify the percentage of appointments, including meter related or other customer related work, that are met within four hours of the promised time/date arranged with the customer. This

includes appointments for installations, meter reads and reconnection appointments (not including those due to non-payment). This measurement will be calculated as follows:

$$\frac{\text{Number of appointments met within 4 hours of the promised time/date}}{\text{Total number of appointments scheduled in the reporting month}}$$

The minimum performance standard for this measurement shall be 90% averaged over a year.

3.4.2 Average Number of Days of Delay After the Original Missed Appointment

This measurement tracks the average number of days after the original missed date it took to complete the work. This includes appointments for meter related customer requests or other customer requested work such as installations, meter reads and reconnection appointments not due to non-payment. At minimum, the distributor must offer to reschedule the work within 30 days.

The minimum performance standard shall be that 100% of the customer's work must be completed within 30 days.

3.5 Gas Emergency Response

Gas Emergency Response is defined as the speed and effectiveness of response to gas escapes and other emergencies in order to alleviate the consequences of detrimental effects.

See Schedule A for a more detailed description of natural gas emergencies. The list will include:

- Aerial Patrol
- Asphyxiation or Injury
- Blowing Gas
- Carbon Monoxide
- Emergency Provider Assistance
- Evacuation
- Fire or Explosion
- Flooding
- Iced Over Regulators
- Low or High Pressure
- Main Service Damage
- Natural Gas/Methane Detector Alarming
- Other Combustibles
- Outdoor Gas Leak/Odour
- Steam
- Strong Indoor Odour*

* Note: this category includes any indoor odour (even slight) will be considered and emergency in a Care or Detention Centre (such as hospitals, day care

centres, nursing homes, senior citizen's homes, permanent correctional facilities, permanent psychiatric institutions, and schools).

3.5.1 Percentage of Emergency Calls Responded to Within One Hour

This measurement will track the average response time to emergencies such as gas leaks, damages and other high priority situations. The response time is calculated from the time the caller reaches a live representative from the distribution company to the time the gas representative arrives on site. The measurement shall be calculated as follows:

$$\frac{\text{Number of minutes required to respond to an emergency call}}{\text{Total number of emergency calls}}$$

The minimum performance standard shall be that 99% of customers have received a response within 60 minutes of their call reaching a live person. The standard shall be calculated on a monthly basis.

3.6 Customer Complaint Written Response

This measurement will ensure that a customer's complaint is responded to in a timely and effective manner. A complaint is a written or verbal expression of grievance or dissatisfaction from a customer about a decision, action taken, or failure to act by the distributor that: is received as either a written complaint to the distributor (i.e., by letter or email); or verbally (i.e., escalated from the call centre or directly received by the executive offices). A request for information or an inquiry shall not be considered a complaint.

3.6.1 Number of Days to Provide a Written Response

The distributor will provide a substantive written response to a customer grievance within 10 days of receiving the complaint. If the grievance needs to be investigated further and more time is required to fully respond to the complaint, an interim response will be sent until a final response can be sent. A substantive response is a response that addresses the issues raised by the complainant. The measurement shall be calculated as follows:

$$\frac{\text{Number of days to provide a written response}}{\text{Number of escalated complaints}}$$

The minimum performance standard shall be that 80% of customers will receive a written response in 10 days of the distributor receiving the complaint.

3.7 Reconnection Response Time

The purpose of this measurement is to track the number of days required to reconnect a customer due to a disconnection for non-payment.

3.7.1 Number of Days to Reconnect a Customer

Once the customer is in good standing as a result of a payment made, the reconnection should be made within 2 days. This measurement shall be calculated as follows:

$$\frac{\text{Total number of days for reconnection following a disconnection for non-payment}}{\text{Total number of customers requiring reconnection}}$$

The minimum performance standard shall be that 99% of customers are reconnected within 2 days (48 hours) of bringing their accounts into good standing.

Schedule A

Description of Type of Emergencies

Aerial Patrol

- Reports from aerial patrol contractor that someone is or may be excavating near a high priority line.

Asphyxiation or Injury

- A call from any source where a person has been injured, overcome, or is nauseated, and gas fumes are suspected.

Blowing Gas

- Any reports of blowing gas. Reports of a pinched off line shall be treated the same as blowing gas.

Carbon Monoxide

- CO symptoms are identified and an emergency provider (such as Fire or Police Department) call the gas distributor for assistance.

Emergency Provider Assistance

- Any calls from emergency providers requesting immediate assistance (Fire or Police Department etc.).

Evacuation

- Any time a building has been evacuated because of a known or unknown strong odour.

Fire or explosion

- Call received from any source for a fire or explosion.

Flooding

- Shut off meters for flooding (priority could change based on local management input).

Iced Over Regulators (Whether Pressure is Affected or Not)

- Reports of iced over regulators.

Low or High Pressure

- Reports of pilot or main burner flames being larger than normal.
- Reports from a contractor or customer that a regulator malfunction has created an unsafe condition.

Main/Service Damage

- Hit line and no blowing gas (includes third party reports of damaged coatings).

Natural Gas/Methane Detector Alarming

- A natural gas/methane detector is alarming.

Other Combustibles

- Calls regarding a leakage or spill of another combustible (conference call with the Fire Department to ensure they are dispatched as well).

Outdoor Gas Leak/Odour

- Strong odour or sound of gas escaping outside.
- Any outdoor odour where the source is unknown.
- Any "A" leaks called in by leak surveyors (company or contractor).

Steam

- A water heater or boiler is overheating and steam is escaping from taps and/or a relief valve.

Strong Indoor Odour

- Strong odour or sound of gas escaping inside a building.
- Any odour (even slight) at a Care or Detention Centre*.

* Care or Detention Centre include hospitals, day care centres, nursing homes, senior citizen's homes, permanent correctional facilities, permanent psychiatric institutions, and schools.

Appendix 2

Attendees of Consultation Meetings Held on August 22 and 23, 2005

The following participants sent representatives to the consultations:

- Union Gas Limited;
- Enbridge Gas Distribution Inc.;
- Vulnerable Energy Consumers Coalition;
- Energy Probe;
- Canadian Association of Manufacturers and Exporters;
- Consumers' Council of Canada;
- London Property Management Association;
- Hydro One Networks; and
- the Coalition of Large Distributors.

Written comments were also received from the Ontario Sewer and Watermain Construction Association.

Appendix 3

Service Quality Indicators for Electricity Distributors

Indicator	Description	Standard
Connection of New Services	The percentage of requests where connection is made within 5 days of all prerequisites.	90% or more
Underground Cable Locates	The percentage of requests for cable locates that are completed within 5 days (of the initial date of the request or, if the customer so designates, a specific requested date).	90% or more
Telephone Service Factor	The percentage of calls to the utility's general inquiry number that are answered within 30 seconds.	65% or better
Appointments Met	The percentage of appointments involving a customer premises visit where appointment date is met.	90% or more
Written Responses to Inquiries	The percentage of customer inquiries requiring a written response where the response is provided within 10 days of receipt of the initial inquiry.	80% or more
Emergency response – urban	The percentage of emergency situations in urban areas where the presence of utility personnel is requested by police, fire, etc, where qualified personnel are on site within 60 minutes. The definition of urban corresponds with that of the "urban" area for municipal government purposes.	80% or more
Emergency response – rural	The percentage of emergency situations in rural areas where the presence of utility personnel is requested by police, fire, etc, where qualified personnel are on site within 120 minutes. The definition of rural corresponds with that of the "rural" area for municipal government purposes.	80% or more
System Average Interruption Duration Index (SAIDI)	Defined as the ratio of the total customer hours of interruption to the total number of customers served. In lay terms, it provides the average amount of time (in hours) that a customer experiences service interruptions over the reporting period.	Within the range of 3 years of historical performance, for LDCs with such information.
System Average Interruption Frequency Index (SAIFI)	Defined as the ratio of the number of customer interruptions (the sum of the total number of interruptions by the number of customer affected by each interruption) to the total number of customers served.	Within the range of 3 years of historical performance, for LDCs with such information.
Customer Average Interruption Duration Index (CAIDI)	Defined as the ratio of SAIDI to SAIFI.	Within the range of 3 years of historical performance, for LDCs with such information.

Appendix 4

Selected Service Quality Standards and Measures for Distributors in Selected Jurisdictions

	Essential Services Commission (ESC), Australia (Victoria)	Office of Gas & Electricity Markets (Ofgem), United Kingdom	Public Utilities Commission (PUC), United States	Alberta Energy & Utilities Board (AEUB), Canada
Selected Service Quality Standards & Measures	Call Center Response Time			
	Calls answered within 30 seconds, and average wait times	Calls answered within 30 seconds, 90% of the time	Percent of calls answered with a live voice in 30 seconds Busy Out Rate: Ratio of busy calls to calls received Abandoned Rate: Ratio of calls that entered holding queue but caller ended the call	Percent of calls answered within 20 seconds, 80% of the time Percent of calls abandoned, not to exceed 5%
	Guaranteed Service Levels			
	Number of appointments scheduled	Number of service appointments met	Number and percent of meters not read within 6 or 12 months	Number and percent of meters not read every 6 months
	Percent of appointments not met within 15 minutes of scheduled time	Number of on time meter reads		Percent of appointments met
	Number of customer disconnections for non-payment			Average numbers of days after missed delivery date
	Complaints			
	Number of customer complaints	Number of complaints Percent of customer correspondence acknowledged within 5 days of receipt, 97%	Number of disputes that did not receive a response within 30 days	Number of complaints by category Number of complaints responded to within 14 and 30 days, 80% and 100% of the time

		Percent of enquiries responded to within 10 days of receipt with substantive response, 90%		
Selected Service Quality Standards & Measures	Emergency Response Time Performance			
	Percent of emergency calls responded to within 60 minutes	Percent of emergency calls responded to within 1 hour		
	Service Reliability Performance			
	Number of unplanned outages	Percent of planned interruptions in which customers were notified at least 12 hours prior, 97% of the time		
	Number of planned outages			
	Connection Performance			
	Percent of customers connected within 2 days of scheduled date			
Billing Performance				
		Percent of bills rendered once per billing period	Percent of bills not rendered as per scheduled billing cycle, not to exceed 1%	
			Percent of bills that were found to be inaccurate due to billing errors, not to exceed 1%	
			Number of inaccurate bills that were corrected	
Reporting	Quarterly Annually	Quarterly Annually	Quarterly Annually	Quarterly Annually
Compliance	Performance made public; but no action other than occasional action plans	Guaranteed compensation to consumer for below-standard performance for some indicators, others are just reported	Subject to compliance plan - which includes action plan to resolve	Meet with party to discuss issues and action plans

Appendix 5

Comparison of Existing Performance of Internal Standards on Consumer Service Indicators at Union and Enbridge

Measure	Description	Union	Enbridge
Telephone Answering	Percentage of calls answered within x seconds	65% in 20 seconds	75% in 30 seconds
Billing	Number of adjustments/total number of charges	<2%	None
Emergency Response	Percentage of calls responded to within one hour	95%	83%
Payment Processing	Accuracy of payments posted to consumer accounts	99.99%	None
Reconnections	Hours to reconnect	48 hours (business)	24 hours
Meter Reads	Percentage of meters not read for four consecutive months	<0.12%	<0.5%
Service Appointment Response	Percentage of service calls in which commitment is met	89%	85%