



ECMI
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Ontario Energy Board
Suite 2700
2300 Yonge Street
Toronto, Ontario
M4P 1E4
ATT: Mr. John Zych, Secretary

March 3, 2006

Dear Mr. Zych,

**Proposed Amendments to the Standard Supply Service Code
Board File No: RP-2004-0205**

In accordance with the Board's Notice dated February 17, 2006, the ECMI Coalition (ECMI) submits its written comments on the above noted Ontario Energy Board file.

In general, ECMI is prepared to support the proposed amendments, but has concerns with respect to the time allowed for their implementation. On pages 2 and 3 of the proposed amendments it is stated, among other things, that " *The Board is therefore proposing to amend sections 3.2.5, 3.2.6, 3.5.1, 3.5.3, 3.6.1, 3.8.4 and 3.9.2 of the SSS Code to extend the period under which TOU pricing is voluntary for electricity distributors from the "second term commencement date" to a date to be determined by the Board (referred to as the "mandatory TOU date"). The Board will provide distributors with adequate advance notice of the date fixed as the "mandatory TOU date"*.

The time required for LDC's to implement changes in billing systems may differ substantively between LDC's and the Board is asked to give careful consideration of the actual time required for implementation of any changes.

Eight copies of the submission are enclosed and electronic copies in Word and Acrobat have been e-mailed to your office.

The requested contact information is as follows:-

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Respectfully submitted for the Board's consideration.

Original signed by
Roger White
President