

May 30, 2005

Mr. John Zych
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
26th floor
Toronto. ON M4P 1E4

Re: RP-2004-0205: Regulated Price Plan

Comments on Proposed Amendments to the Standard Service Supply Code:

Dear Mr. Zych:

Following from your notice of May 18, 2005 the Building Owners and Managers Association of the Greater Toronto Area (BOMA) offers these comments on the proposed amendments:

We fully support the Board's proposed approach of having final RPP variance settlement amounts shown clearly as a separate line item, and not incorporated into an existing electricity cost item.

Commercial consumers require the ability to audit and verify charges, and to properly record charges across a portfolio of buildings, usually spanning different LDCs. To that end we support all initiatives that provide greater consistency and clarity across LDC and Retailer bills.

On a related matter, we are advised that some LDC's have 'bundled' charges for large users in the same manner as is required for low volume consumers. This omission of key billing determinant information is not acceptable in our view. For example, the bundling of 5 separate charge components into one single 'delivery' charge (which can be in excess of \$30,000 per month for a large account) does not provide sufficient information to allow for bill validation or detailed cost tracking.

Yours truly,

C.S (Chuck) Stradling Executive Vice President

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