



July 13, 2006

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

Re: RP – 2004-0205
Proposed Amendments to the Standard Supply Service Code re
Regulated Price Plan – Pilot Projects

Dear Ms Walli:

Following from your notice of July 12, 2006 the Building Owners and Managers Association of Greater Toronto (BOMA) wishes to provide these comments.

By way of background, the Building Owners and Managers Association is an international organization of 18,000 commercial real estate professionals. BOMA Greater Toronto, with a network of over 700 members, represents the association in the Greater Toronto Area. BOMA is a strong advocate of the move to competitive energy markets. Our members actively participate in programs and initiatives to improve energy efficiency and demand response capability.

BOMA Toronto fully supports the proposal, as described. We have long advocated the need for proper price signals to be received by all consumers. This will help to develop demand response capability, improve overall market efficiency and eliminate structural cross subsidies. Small consumers that have no price signal motivation to curtail load contribute to unnecessarily high demands, raising prices for all consumers – large and small.

We were disappointed at the postponement of the introduction of TOU RPP prices earlier this year. We view this proposal as a means of getting on with the job - facilitating the introduction of TOU pricing through those LDCs with the inclination and capability to implement.

We have three specific comments:

1. Such RPP Pilots should be available to all RPP consumers, not just residential. This would allow participation by small commercial and other regulated consumers such as multi-residential.
2. TOU pilot prices that are different from the standard RPP Prices should be available for review and comment by interested parties.
3. Information on all LDC pilot TOU projects should be properly publicized to capture the participation of interested and eligible consumers.

Yours truly,

A handwritten signature in black ink, appearing to read 'Chuck Stradling', with a long horizontal flourish extending to the right.

Chuck Stradling
Executive Vice President