



Ontario

Energy

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Ontario Energy Board
P.O. Box 2319
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****VIA EMAIL & COURIER****

Attention: Board Secretary

Re: EB-2005-0453

Dear Mr. John Zych:

Ontario Energy Savings L.P. ("OESLP") is writing in response to the Ontario Energy Board's ("Board") invitation to comment on the proposed amendments to the Gas Distribution Access Rule ("GDAR") Service Quality Requirements ("SQR").

OESLP is concerned that not one of the recommendations from its letter and submission dated October 31, 2005 was accepted and, further, that no reason for the exclusion was provided in the Board's decision.

OESLP contends that retailers are also customers of the utilities with unique service requirements. Retailers provide services to end-use customers but are fully dependant on the services of the LDC in providing services to the customers in all aspects of the customer relationship. Therefore, those services need to be monitored to ensure compliance and consistency in quality. Some of the key indicators that provide a picture of the level of service provided to retailers as a customer group include:

- i) enrollment, response and service intervals;
- ii) billing processes and billing accuracy;
- iii) settlement processes and remittance intervals; and
- iv) response time to inquiries.

OESLP strongly submits that service metrics for the items listed above should be adopted and added to the GDAR document under the SQR section.

Should the Board decide not to include any of these service metric recommendations, OESLP respectfully requests that the Board provide its decision with reasons such that participants can understand the Board's view.

Thank you for the opportunity to comment on the proposal.

Please contact the undersigned if additional information is required.

Yours truly,

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