



**Ontario
Energy
Savings
Corp.**

6345 Dixie Road
Suite 200
Mississauga
L5T 2E6 Canada

Telephone
905.795.4204

Facsimile
905.564.6069

E-mail
nruzycki@oesc.ca

Toronto
Mississauga

December 22, 2005

VIA E-MAIL & COURIER

John Zych
Board Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Re: Board File No EB-2005-0545

Dear Mr. Zych:

Ontario Energy Saving Corp. ("OESC") is writing this letter in response to the Board's e-mail on Proposed Amendments to the Gas Distribution Access Rule ("GDAR"), dated December 8, 2005, wherein the Board invited interested parties to provide comments on the subject amendments.

With respect to the proposed timeline amendments, OESC is of the belief that the implementation dates of Phase I and Phase II should not be set until the technical standards and other detailed requirements are completed. To reiterate our submission, the absence of completed data makes it impractical and unrealistic to meet a January 1, 2007 Phase I implementation date. OESC believes that, at a minimum, a one-year window is required to ensure appropriate systems are implemented to handle the requirements of GDAR as it pertains to Natural Gas.

OESC respectfully submits that the implementation dates should be one year from the time the requirements are known for Phase I and similarly, another full year before the implementation of Phase II. For both Phases, respectively, this length of time is required to allow sufficient time for parties to properly and effectively develop, implement and test the GDAR applications. The current proposed timeline allows less than 6 months, from the anticipated completion of the standards and technical requirements, to design, develop, build and implement all required GDAR processes to allow testing to begin in September of 2006. OESC does not believe that this timeline is sufficient.

OESC remains committed to working collaboratively with other industry participants to complete the implementation as expeditiously as possible.

Please contact me if you have any questions or wish to discuss this submission in more detail.

Yours truly,

Nola L. Ruzycski
Senior Manager, Regulatory & Utility Management