

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board proposing to make a Rule under section 44 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 Sch. B., relating to gas distributors and access to distribution services.

**PROPOSED GAS DISTRIBUTION ACCESS RULE
SUPPLEMENTAL SUBMISSIONS OF
THE COALITION FOR EFFICIENT ENERGY DISTRIBUTION
("CEED")**

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1. The Coalition for Efficient Energy Distribution ("CEED") is a coalition of gas vendors that is currently comprised of Suncor Energy Inc./Sunoco Inc., Dynegy Canada Inc., PanCanadian Petroleum Limited, and Mirant Americas Energy Marketing Canada, Ltd.. CEED members have a common interest in the development of an efficient, and truly competitive natural gas market in Ontario and provide their comments on the *Proposed Gas Distribution Access Rule* ("Proposed GDAR") to the Ontario Energy Board (the "Board") in furtherance of this objective.
2. CEED actively participated in the Distribution Access Rule Taskforce, which produced the *Final Report of the Distribution Rule Access Rule Taskforce* to the Ontario Energy Board on June 8, 2000. On September 25, 2000, Ontario Energy Board staff (the "Board Staff") issued the *Draft Gas Distribution Access Rule* (the "Draft GDAR") for review and comment by interested parties. On October 18, 2000 CEED provided its comments on the Draft GDAR in support of the provisions pertaining to customer mobility, marketer consolidated billing, billing inserts, and the Board's jurisdiction to enact the rule. Following the submission of comments by all interested parties, on February 6, 2001, the Board issued the *Proposed Gas Distribution Access Rule* ("Proposed GDAR") for review and comment. On February 26, 2001 CEED provided its comments to the Board, again supporting the proposed provisions on customer mobility, retailer consolidated billing, billing inserts, and the Board's jurisdiction to enact the rule.
3. On May 10, 2001 the Board communicated its intention to allow for oral consultation on the Proposed GDAR (the "Oral Proceeding"). The instant submission are supplemental to CEED's October 18, 2000 and February 26, 2001 Submissions and are made for the purpose of updating CEED's prior submissions for the Oral Proceeding to be held by the Board on June 25, 2001.
4. There continue to be many contentious issues relating to the Proposed GDAR. It is noteworthy that in her letter accompanying the Draft GDAR the Board's Director of Licensing indicated that the current provisions of the Proposed DAR

attempt to resolve these contentious issues by reflecting "enhanced levels of consumer protection and parity with the Board's requirements for the electricity industry". These goals are laudable and integral to the development of a competitive energy market wherein competition is facilitated by empowering through choice. As a result, CEED continues to commend and support the Board in implementing provisions which reflect the sustainable vision of a truly competitive and integrated Ontario Energy Industry.

5. These Supplemental Submissions are intended to be read in conjunction with CEED's previous submissions on the GDAR (attached at Appendix A and B) and are organized as follows: