

June 22, 2001

Ontario Energy Board  
2300 Yonge St., 26<sup>th</sup> Floor,  
Toronto, Ontario  
M4P 1E4

Attention Paul Pudge, Board Secretary

Re: Comments to the Draft Gas Distribution Access Rule

On behalf of EIS and the customers in Ontario, we would like to thank the Ontario Energy Board for allowing us to provide input for your consideration as you strive to establish an equitable rule for market participants and most importantly gas consumers in Ontario.

The following is a summary of the items we wish to discuss with the board Board's Oral Consultation on the Proposed GDAR scheduled June 28, 2001

**We support 7.4 specifically item 7.4.2 on behalf of customers in Ontario**

**Energy Information Systems (EIS) background**

Independent Energy Information application consultant which determines what information customers require to better manage their energy usage. EIS has provided services to customers, consultant, and utilities since 1995. Principles located in Canada and with associates in the UK.

**Statement**

Granting read only access to the utility meter allows the customer to capture utility grade data, which the customer can use to manage their natural gas, costs more effectively through procurement options and through energy management initiatives.

**Review the current energy information source and the cons associated with information**

Currently the Gas Distributors are making this energy information available to the consumer via

A secondary or "check meter" type device. (A series of devices are installed at the customers cost to produce a customer signal that is processed through third party hardware/software to create the same information generated by the utility

meter) While this method achieves some of the desired results, there are problems with this arrangement:

- Incremental cost to the consumer for extra equipment (\$3,000 to \$6,000)
- Significant lead time (3 to 6 months) is required to arrange and install this equipment.
- Data collected is not identical to utility meter data

Pursuing this option means the consumer must make a choice as to what third party service or hardware they arrange with may impact future access to this information. In other words if the consumer opts to change services there may be a issue of compatibility.

or

Utility Web Site. While this method achieves some of the desired results, there are problems with this arrangement:

- Time consuming and difficult to capture data for multi-site in multi utilities
- Information available is fixed - example daily GJ's

### Review the Pros of 7.4.2

Granting read only access to the utility meter eliminates the extra cost factor and immediately sets the standard for compatibility among service providers in this area. Ultimately data collected with read only access will ensure data accuracy and provides timely, flexible options for the customer.

### EIS Experience in Ontario

#### **Read only Access Benefits – As per Procurement and Management of Natural Gas Commodity**

- Better define Daily contract amount – Allows the customer to determine what equipment or operation impacts their usage
- Better manage interruptible rate – allows the customer to better define the amount of gas they can buy in the market place during interruption
- Better define when or if load balancing should occur throughout the contract year
- Provides the customer/agent with information and the confidence to further unbundle

From our experience customers who have had access to this data unbundled further because of the savings they see possible by being more proactive in managing the commodity

### **Read only Access Benefits – As per Energy Management or Conservation**

- Facilitates better knowledge of energy usage
- Reduces wastes
- Encourages and verifies better equipment utilization

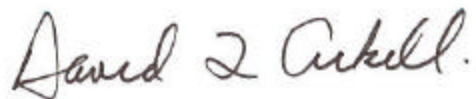
From our experience customers with this data are forecasting a savings of natural gas usage between 5% to 25%.

### **Consistency between electrical and natural gas codes**

Item 7.4.2 is consistent with the electrical distribution code 11.2

From our experience in the energy industry information access, leads to many benefits for the customer. It give the consumer a choice and that is what deregulation is all about

Yours truly,

A handwritten signature in black ink that reads "David Z. Arkell." The signature is written in a cursive, slightly slanted style.

Energy Information Systems Inc.