

Enbridge Gas Distribution Inc.  
500 Consumers Road  
North York, Ontario, M2J 1P8  
www.enbridge.com/gas

Richard J. Campbell  
Manager, Regulatory Policy and Research  
Tel 416 495 5173  
Fax 416 495 6072  
richard.campbell@enbridge.com

September 1, 2006

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street, Suite 2701  
Toronto, Ontario  
M4P 1E4

**Re: EB-2006-0198: Proposed Amendment to the GDAR**

Dear Ms. Walli:

I am writing to provide the comments of Enbridge Gas Distribution Inc. (“Enbridge” or “the Company”) in response to the **Notice of Proposal to Amend the Gas Distribution Access Rule** which was issued by the Board on August 18, 2006.

The Company would like to acknowledge the efforts that the Board has taken to accommodate the concerns of market participants in the preparation for GDAR implementation. As referenced in our comments of July 31 2006, the Market Test Plan developed by the Working Group is comprehensive and achievable and the extension of the implementation date to June 1, 2007 provided by this Notice provides additional time required for preparation for the Market Test.

The Company submits two specific comments on the proposed amendment to Section 1.4.3 of the GDAR:

1. The proposed implementation date of June 1, 2007 will be threatened if the scope of the EBT Standards continues to change. The Working Group is currently processing about 15 new GDAR change requirements. The breathing room in the project schedule provided by the new implementation date is fully taken-up by these changes. Enbridge will use the latest version of the EBT standards, Schemas, and related documents in its design, development, and implementation of system and business process changes that are required to be GDAR compliant. Any further changes by the working group to these documents will have an impact on meeting the June 1, 2007 implementation date.

2. With respect to the requirement to accommodate gas distributor-consolidated billing in a bill-ready form by January 1 2008, the Company has requested relief from this provision by separate letter (attached) dated August 18, 2006.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. Campbell for".

Richard J. Campbell  
Manager, Regulatory Policy and Research  
Enbridge Gas Distribution Inc.

c.c. Mr. Brian Hewson, Chief Compliance Officer

Attachments

## ATTACHMENT

**Systems Analysis:** A systematic investigation of the specifications of what the system needs to do in order to meet the requirements of the end users and determine the functions of the system and how they related to each other and any other system.

**Systems Design:** A blueprint or a model of a system that describes in detail how a proposed information system will meet the information needs of end users. One of the inputs to this activity is the results of the Systems Analysis phase. The blueprint includes hardware and software architecture, systems components and modules, system and data interfaces, and data requirements for a system to satisfy user requirements. All systems development is based on the results of this activity.

**Systems Integration:** Assembling complete systems by linking, merging, and testing the individual systems, modules, and process components defined in the Systems Design phase. Generally, many errors are flushed out in this phase as systems are connected to each other and tested. Requirements and Design assumptions are also validated as all systems are working together and connected to each other. The focus in this phase is to verify functional, performance, and reliability requirements placed on the system. . The complexity of this phase increases based on the number of systems that need to be integrated.

**Systems Stabilization:** A process of ensuring that all systems (once integrated) are working together and producing the desired result in a reliable systems environment. In this phase detailed testing occurs where test scenarios and scripts are executed to ensure that the end-user requirements are met. System performance metrics are verified in an effort to maintain the integrity of the system. Errors may be discovered in this phase and fixes are applied and retested. Success at this stage increases the comfort level of delivering a well tested and reliable system.

**User Acceptance Testing:** A process to obtain certification and confirmation by end-users and Subject Matter Experts through a formal review of the system that all mutually agreed-upon requirements have been met. This is one of the final steps and will occur before the end-users accept a new system. Testers derive formal test plans from user-requirements. The focus is on the final verification of the required business function and flow of the system emulating end-to-end real-world usage of the system.

In the case of GDAR, UAT will need to be done internally before Market Testing. Market testing can also be considered as part of UAT as success in Market Testing is an indication that the Market 'accepts' the system as design and built. UAT combined with System stabilization phase should mirror (at a minimum) the Market Test.