

**FINANCIAL SERVICES DEPARTMENT  
KITCHENER UTILITIES**

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September 1, 2006

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

Dear Ms. Walli:

Re: Notice of Proposed Amendment To The Gas Distribution Access Rule – Board File No: EB-2006-0198

On August 18<sup>th</sup>, the Board provided Notice of Proposed Amendment To The Gas Distribution Access Rule.

The City of Kitchener - Kitchener Utilities (“Kitchener”) is an active participant in the GDAR working groups. Kitchener provides the following comments:

1.4.3 Chapter 4 of this Rule shall come into force on June 1, 2007.

Kitchener supports this proposed amendment. Kitchener further suggests the effective date for the Rule to come into force should be no sooner than July 1, 2007. Kitchener is a small distributor with limited resources and while we have made great progress in the design of our systems, the development and internal testing has been impacted by revisions to the EBT standards and Schemas.

Secondly, regarding the comment “provided that nothing in Chapter 4 shall require a gas distributor to accommodate gas distributor-consolidated billing in a bill-ready form until January 1, 2008”, given the proposed amended implementation of the GDAR EBT, Kitchener recommends, at a minimum, a similar extension be applicable to this date.

Please contact me at (519) 741-2532 if you have any questions or require additional information.

Yours truly,

