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Comments – The Gas Distribution Access Rule

Congratulations to the Ontario Energy Board and Board staff for their work and consideration in proposing The Gas Distribution Access Rule. Ontario Hydro Energy supports the direction of providing greater customer choice in both gas supplier and related customer services and customer mobility.

Ontario Hydro Energy's comments are below.

Section 6.2.4: Customer relocation - residence change - should not provide the customer an opportunity to walk from a contract. A customer move within an LDC territory should result in an automatic transfer of account number - ie, no question to be answered by customer and no opportunity to cancel. The LDCs have had years to address this item and to make inter-LDC transfers possible. The obstacle the LDCs have claimed in the past is "beyond our billing systems". Now that major businesses have been added to the mix, cross-pollination of billing expertise should remove this obstacle.

Sections 6.3.3.1 & 6.3.3.2: These 2 sections look identical, except one says 60 days and one says 14 days. Ontario Hydro Energy recommends a time period of 14 days.

Sections 6.5.3 & 6.5.4: These sections detailing a second waiting period that the current gas vendor can cause to happen when a new gas vendor request a switch is problematic. Four issues:

- There is nothing to prevent the current gas vendor from simply requesting the second waiting period on a spurious basis just to delay revenue to the new vendor
- The current vendor then has an unfair advantage to implement "save a customer" tactics.
- The customer is extremely vulnerable. They have just made a switch decision and risk being subjected to high pressured by the incumbent - confusion, pressure on a choice they have just made
- This particularly disadvantages new acquisition players, reducing the likelihood of success of new entrants and diminishing the size of the competitive playing field.



Section 6.3.4: Ontario Hydro Energy requests 30 rather than 60 days as an appropriate length of time to complete this process. Ontario Hydro Energy suggests the words "*and initiation of first gas flow*" be added after the word "*STR*" in the last sentence of section 6.3.4.

Section 6.6.5: The rule should include clear instruction that the LDC must not promote system gas. Any information provided must also relate the different price characteristics of system gas compared to a fixed price gas vendor offer.

Section 8.5.1: Presumably, the overall intent of gas de-regulation is to facilitate successful and vibrant competition in order to benefit consumers in the long term. Access by the gas vendors to the system gas bill makes it easier for customers to get information about the range of competitive possibilities AND provides a cost efficient vehicle for gas vendors to sell, increasing the likelihood of success of a strong competitive field of players.

Ontario Hydro Energy recommends that all gas vendors CAN access system gas bills on a fair and equal terms basis, which could be defined in a policy set out by the system gas supplier and approved by the Board. This policy would specify costs to insert and a fair approach, such as a lottery basis, timing of access to this channel among those gas vendors that wish to use it. Benefits to customer: Easy exposure to all possibilities and the opportunity to select offers on the offers own merits. This approach enhances competition where the best OFFER (or customer value) wins.

Lastly, Ontario Hydro Energy recommends consideration of the implementation of a communications protocol such as the Electronic Billing Transaction system to facilitate transactions between market participants and maximize the use of investments made to enhance transaction capability.

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