



VIA FACSIMILE (416) 440-7656

February 26, 2001

Ontario Energy Board
2300 Yonge Street.
P.O Box 2319
Toronto Ontario
M4P 1E4
Attention: Mr. P. Pudge, Board Secretary

RE: COMMENTS – GAS DISTRIBUTION ACCESS RULE RP-2000-0001

Thank you for the opportunity to comment on the proposed Gas Distribution Access Rule.

As the Local Distribution Company for both Natural Gas and Electricity for the City of Kingston, we support the alignment of rules and procedures for electricity and natural gas distribution.

Response to the Draft Gas Distributor Access Rule

Section 36. p.8 of the Ontario Energy Board Act grants certain Municipalities exclusion from Section 36. paragraphs 1-7.

The Gas Distributor (Distribution) Access Rule must reflect this part of the Ontario Energy Board Act in all applicable areas including, but not limited to the following sections:

- 1.5. To Whom this Rule Applies
 - 1.5.1

- 2.1 Eligibility
 - 2.1.1

- 4. Expansion and Connection to a Distribution System
 - 4.1.1
 - 4.2.1
 - 4.2.2

- 7. Service Transfer Requests
 - 7.4.5

11. Financial Default by Marketers
11.2.2

And further:

S. 6 Distributor- Marketer Relations
6.2

Customer Account numbers are system generated at the time of account setup. While unlikely to change, any account number change would also be system generated at the time the change was initiated. A five day advanced notification would be possible but would not be able to include the new account number.

Thank you again for the opportunity to file a submission.

Yours truly,

J.A. Keech
President & CEO
Utilities Kingston