

**IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S. O. 1998, c.15, Schedule B of the *Energy Competition Act, 1998*,**

**AND IN THE MATTER OF the Ontario Energy Board's Notice of Proposal to make a Rule under Section 44 of the *Ontario Energy Board Act, 1998*, relating to gas distributors and access to distribution services, the proposed Rule being entitled *The Gas Distribution Access Rule*.**

**Ontario Energy Board File #: RP-2000-0001**

**Date: February 26, 2001**

**Ontario Energy Board File**    **RP-2000-0001**

**#:**

**Title of Proceeding:**            **The Ontario Energy Board's Notice of Proposal to make a Rule under Section 44 of the *Ontario Energy Board Act, 1998*, relating to gas distributors and access to distribution services, the proposed Rule being entitled *The Gas Distribution Access Rule*.**

**Respondent's Name**            **Toronto Hydro Energy Services Inc.**

**Address of Respondent's Representative:**    **14 Carlton Street  
Toronto, Ontario  
M5B 1K5**

**Respondent's Representative:**            **I. Bruce MacOdrum, Q.C.  
Vice President and General Counsel  
Corporate Secretary**

**Telephone:**            **(416) 542-2546**

**Facsimile:**            **(416) 542-2676**

**IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S. O. 1998, c.15 Schedule B of the *Energy Competition Act, 1998*,**

**AND IN THE MATTER OF the Ontario Energy Board's Notice of Proposal to make a Rule under Section 44 of the *Ontario Energy Board Act, 1998*, relating to gas distributors and access to distribution services, the proposed Rule being entitled *The Gas Distribution Access Rule*.**

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**Written Submission  
of  
Toronto Hydro Energy Services Inc.**

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## **Comments**

- 1. Toronto Hydro Energy Services Inc. (“TH Energy Services”) is the holder of Gas Marketer Licence Number GM-2000-0011 and as such has a direct interest in all matters of jurisdiction, substance and procedure in the regulation of natural gas rates in Ontario, and in decisions of the Ontario Energy Board which may affect its operation in the Ontario gas market.**
- 2. The Ontario Energy Board has proposed to make a Rule under Section 44 of the *Ontario Energy Board Act, 1998*, S. O. 1998, c.15, Schedule B of the *Energy Competition Act, 1998*, relating to gas distributors and access to distribution services.**
- 3. TH Energy Services has been a constant advocate for a competitive market in Ontario’s energy sector and supports the position of open access for customers to both the distribution system and their choice of energy services supplier.**
- 4. TH Energy Services believes that symmetrical rules for access to the distribution system for both electricity and natural gas will be beneficial for establishing consistency within the energy sector and for providing greater clarity to customers on the options and processes to receive energy services.**
- 5. The proposed Gas Distribution Access Rule (“DAR”) provides improved clarity for customers and marketers regarding access to gas distribution systems.**

- 6. TH Energy Services recognizes and appreciates the considerable effort that OEB Staff, members of the natural gas industry, and other interested parties have contributed to the development of the DAR.**
- 7. TH Energy Services hereby makes the following comments on the proposed Rule.**
- 8. TH Energy Services believes that Customer Mobility is imperative to the success of a competitive energy market. Customers must have the option to be able to select the service provider that meets their needs.**
- 9. Section 8.3 of the DAR addresses the Billing Options that will be available to customers and Agents, Brokers and Marketers (“ABMs”). TH Energy Services supports having three billing options, specifically, Distributor Consolidated Billing, Gas Vendor Consolidated Billing and Split Billing. TH Energy Services believes that in a truly competitive market customers and ABMs should have the option of how the billing of services is conducted.**
- 10. TH Energy Services also believes that there should be symmetrical rules for Customer Mobility and Billing Options in both the gas and electricity industries. This will allow the customer to understand the rules and policies for purchasing energy in Ontario in a competitive marketplace. It is also important that service providers who offer both gas and electricity products and services**

**be able to provide these products to customers in a consistent manner.**

**11. TH Energy Services appreciates the opportunity to provide comments on the DAR, as it views the development of a Rule for access to distribution services a key component of the successful development of a competitive energy market in Ontario.**

**12. Dated this 26<sup>th</sup> day of February, 2001.**

**I. Bruce MacOdrum, Q.C.  
Vice President and General Counsel  
Toronto Hydro Energy Services Inc.**