

March 9, 2001

Ontario Energy Board
2300 Yonge Street
Toronto, Ontario
M4P 1E4

Attention: Mr. Paul B. Pudge, Board Secretary

Re: Gas Distribution Access Rule – RP-2000-0001

Dear Mr. Pudge:

The Ontario Energy Board (the Board) issued a notice of proposed rule making on February 6, 2001 concerning a proposed distribution access rule. The following are Union's comments on the proposed rule.

This submission has been made by e-mail so as to meet the 4:30 p.m. February 26, 2001 deadline for submissions. Any previously filed public documents referenced in this submission are hereby included as part of this submission for inclusion in the record of this proceeding. Union has provided electronic copies of referenced documents where available.

Union continues to be of the view that the issues addressed by the rule have far reaching consequences and are not simply technical matters for the smooth functioning of the natural gas markets.

Because of the far-reaching consequences that flow from the draft Rule, the public interest will be best served by considering these matters in a full public hearing with expert evidence, cross-examination, and the ability for all parties to make argument before a panel of the Board.

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If you have any questions concerning this submission, please call me at (519) 436-4515.

Yours truly,

Marcel Reghelini
Manager, Regulatory Affairs