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Toronto, January 28, 2010

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Walli:

RE: Natural Resource Gas Limited
Application for Exemption from Certain Sections of GDAR

We are counsel to Natural Resource Gas Limited (“NRG”). Please find the enclosed Application for an Order or Orders exempting NRG from certain sections of the Gas Distribution Access Rule (“GDAR”).

Please do not hesitate to contact me should you have any questions or concerns.

Yours very truly,



John Beauchamp

JB/mnm

Encl.

cc. Jack Howley (*Natural Resource Gas Limited*)

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Act, 1998*
R.S.O. 1998, Chapter 15;

AND IN THE MATTER OF an Application by Natural Resources Gas Limited to the Ontario Energy Board for an Order or Orders exempting Natural Resource Gas Limited from certain sections of the Gas Distribution Access Rule (“GDAR”)

APPLICATION

1. The Applicant is Natural Resource Gas Limited (“NRG”). The Applicant is an Ontario corporation with its main office in the Town of Aylmer, Ontario. NRG carries on the business, among other things, of selling and distributing natural gas within Ontario.
2. The Board has granted NRG a number of exemptions in the past relating to reporting of certain sections of Natural Gas Reporting and Record Keeping Requirements for Gas Utilities (EB-2003-0117).
3. Section 7.3.1 (Telephone Answering Performance) of GDAR is based on the utility telephone service being on an automated answering system. The technology and system implementation costs associated with automating the answering system would presently exceed the benefits for NRG. The Applicant is a small utility and all calls are currently answered by two live operators.
4. NRG, therefore, requests an exemption from Section 7.3.1 of GDAR, including subsections 7.3.1.1 and 7.3.1.2, pursuant to subsection 44(6) of the *Ontario Energy Board Act, 1998*.
5. NRG will continue to monitor its customer service level in this area and also review available systems that might enhance our service at a cost effective level in the future.
6. In order for NRG to perform the necessary data collection under the Service Quality Requirements, the Applicant’s existing systems required a number of program modifications. NRG has made extensive efforts to implement the required changes, some of which were only employed in late 2009 (they were successfully completed and implemented at a nominal added cost). As a result, NRG has been unable to collect Service Quality Requirement data for the year 2009, with the exception of that data required under 7.3.6.1 of GDAR (Number of Days to Provide a Written Response). With these modifications, NRG will collect information during the year 2010 in preparation for reporting SQR performance standards and measurements to the Board on January 30, 2011.

7. NRG thus seeks an exemption from the obligation to file Service Quality Requirement data for the year of 2009, as required under GDAR, with the exception of that data required under Section 7.3.6.1, which will be filed with the Board on or before January 31, 2010.
8. NRG is making every effort to accommodate the Board's requests, which includes filing its Action Plan (in compliance with GDAR reporting requirements) on January 27, 2010.
9. NRG requests that, pursuant to Section 34.01 of the Board's *Rules of Practice and Procedure*, this proceeding be conducted by way of written hearing.
10. The Applicant and its representative may be reached at the following addresses:

(a) The Applicant

Mr. Jack Howley
Natural Resource Gas Limited
39 Beech Street East
Aylmer, ON N5H 2S1

Telephone: (519) 773-5321
Facsimile: (519) 773-5335
Email: howley@nrgas.on.ca

(b) The Applicant's Counsel

Mr. John Beauchamp
Ogilvy Renault LLP
Royal Bank Plaza, South Tower
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Toronto, ON M5J 2Z4

Telephone: (416) 216-1927
Facsimile: (416) 216-3930
Email: jbeauchamp@ogilvyrenault.com

Dated at Toronto, Ontario this 28th day of January, 2010.

NATURAL RESOURCE GAS LIMITED

By their Counsel,



OGILVY RENAULT LLP

John Beauchamp