

# Aiken & Associates

578 McNaughton Ave. West  
Chatham, Ontario, N7L 4J6

Phone: (519) 351-8624  
Fax: (519) 351-4331  
E-mail: [raiken@xcelco.on.ca](mailto:raiken@xcelco.on.ca)

October 16, 2009

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

Dear Ms. Walli:

**Re: EB-2009-0162 – Comments of the London Property Management Association**

This letter is in response to the Board's September 21, 2009 letter related to the Notice of Proposed Amendment to a Rule - The Natural Gas Reporting and Record Keeping Requirements (RRR) Rule for Gas Utilities and provides the comments of the London Property Management Association ("LPMA") on the proposed changes to the Gas Utility Reporting and Record Keeping Requirements. Three paper copies have been provided to the Board and an electronic version has been filed through the Board's web portal at [www.err.oeb.gov.on.ca](http://www.err.oeb.gov.on.ca).

**Comments**

LPMA has reviewed the proposed changes and believes that they are appropriate, with one clarification and one exception both of which are noted below.

**Section 2.1.14 (b)**

LPMA seeks clarification on this section. The information to be supplied is the "quantity of gas supplied for the account of direct purchase customers ...". LPMA notes that the gas distributors do not supply gas for the accounts of direct purchase customers. These direct purchase customers, either directly or through their agent supply the gas. It is therefore assumed that this section requests the "Quantity of gas supplied for the account of direct purchase customers *by such customers or their agents* ...".

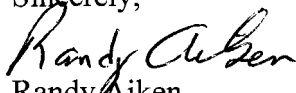
Section 2.1.14 (d)

As noted above, LPMA has one exception to the general agreement with the proposed changes to the reporting requirements. LPMA has a concern on the wording of this proposed section. In particular, LPMA notes that gas utilities do not sell gas to direct purchase customers, so the wording at the beginning of this section would appear to be inappropriate.

LPMA suggests changing “Quantity of gas sold to direct purchase customers ...” to “Quantity of gas delivered to direct purchase customers ...”. This more accurately reflects the fact that the gas distributors deliver gas to direct purchase customers, but do not sell the gas to them.

Similarly, the portion of the proposed section that reads “The reported quantity will contain a billed quantity of gas ...” does not appear to be appropriate since the gas distributors do not bill all direct purchase customers for the quantity of gas. It may be more appropriate for the wording to be “The reported quantity will contain a billed quantity of gas deliveries ...”.

Sincerely,

  
Randy Aiken  
Aiken & Associates