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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-2009-0163 – Comments of the London Property Management Association

This letter is in response to the Board's September 21, 2009 letter related to the Consultation on Proposed Changes to the Natural Gas Reporting and Record keeping Requirements: Gas Marketer Licence Requirements and provides the comments of the London Property Management Association ("LPMA") on the proposed changes to the reporting and record keeping requirements for gas marketers. 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.

Comments

The Board is proposing amendments to three sections of the Natural Gas Reporting and Record Keeping Requirements (RRR) Gas Marketer Licence Requirements.

The first proposed change is to Section 1.5 that deals with the confidentiality of information. The proposed changes to this section are minor in nature and make this section more consistent with the changes proposed to the reporting and record keeping requirements applicable to the electricity sector. LPMA accepts the proposed changes as appropriate.

The second proposed change deals with Section 2.1.1 and deals with a greater level of detail in the reporting of the number of customers based on the remaining term of the contract. LPMA believes this information would be useful for the Board and other parties to have. For example, there may be trends toward longer or shorter remaining terms of contracts for all marketers in aggregate that would provide insight into customer decisions. LPMA agrees with the proposed amendments to this section.

Finally, the Board proposes to add Section 2.1.2 to the reporting requirements. This section would provide specific market monitoring information. LPMA generally accepts that the information to be reported is appropriate, but believes that further information should be provided.

Specifically, LPMA submits that part (b) of Section 2.1.2 should be expanded. Rather than just the number of new enrolments, LPMA suggests that the number of new enrolments could be further disaggregated into the term of the contract entered into (for example, 1 year fixed price, 3 year fixed price, 5 year fixed price, blended price, etc.). Similar to the proposed amendments to Section 2.1.1, this would provide the Board with more insight into customer decisions.

Sincerely,



Randy Aiken

Aiken & Associates