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via RESS and courier

October 19, 2009

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

**Re: EB-2009-0161: Consultation on Proposed Changes to the Electricity Reporting and Record Keeping Requirements**

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Shell Energy North America (Canada) Inc. ("Shell Energy") submits these comments in response to the request issued by the Ontario Energy Board ("Board") on September 21, 2009.

Given the nature of the proposed changes, the Board and stakeholders would have benefited from a more informal consultation prior to the issuance of the current proposal. This may have addressed some of the concerns that will be raised, and narrowed the need for the filing of formal comments. It may have also provided stakeholders a better appreciation for the intended purpose of the changes and why implementation is desired within such a short timeframe. The proposed effective date of January 1, 2010 may not provide enough time for the consideration of concerns, and the implementation of data acquisition and process changes by electricity retailers. Obtaining the additional information in section 4.1.1, and adjusting how it is acquired and reported, may require significant system changes.

New section 4.1.2 needs to be qualified with an explicit statement that the reporting requirements only apply to the business activities related to low volume consumers. This currently voluntary information is appropriately only requested as it relates to low volume consumers. It is not relevant for larger consumers and may not be possible or practical to report. For example, business with large consumers is not typically based on standing offers or contract types, but rather is driven by the requests of consumers for types of products, prices, and terms that vary with the needs of each consumer. Reporting information related to this would amount to reporting every interaction with a customer, including when pricing and products evolve, and could even see multiple changes in price and other terms over an individual day.

Sincerely,

*original signed*

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