

# Aiken & Associates

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October 30, 2009

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

Dear Ms. Walli:

**Re: EB-2008-0052 – Notice of Revised Proposal to Make a Rule – Storage and Transportation Access Rule (“STAR”) – BOMA and LPMA Comments on Revised Proposed Rule**

These comments are provided on behalf of the Building Owners and Managers Association of the Greater Toronto Area (“BOMA”) and the London Property Management Association (“LPMA”). BOMA & LPMA have reviewed the Revised Proposal to Make a Rule - Storage Transportation and Access Rule (“STAR”), the discussion related to the Board’s Policy and Rationale as well as a number of stakeholder comments provided in response to the Board’s April 9, 2009 letter.

BOMA & LPMA are generally satisfied that the revised proposal meets the two key objectives of STAR, those being customer protection and transparency.

There is one area, however, that BOMA & LPMA believe fall short of satisfying those objectives. This area relates to the posting of pricing information for storage contracts with terms less than one year in length. The Board has indicated that these contracts may be driven by specific customer requirements and that pricing information for such contracts may provide limited benefit to the market.

BOMA & LPMA submit that any storage contract, regardless of length, is driven by specific customer requirements. It is more likely that the pricing related to the contracts of under one year in length are driven by specific circumstances at a given point in time.

While the Board may be correct that pricing information for such contracts may provide limited benefit to the market, the alternative that results from the Board's proposal is guaranteed to provide no benefit whatsoever to the market.

BOMA & LPMA urge the Board to reconsider this issue. As a compromise, it is submitted that information should be posted on April 1 and October 1 that shows the range of prices (minimum and maximum) for contracts of duration of less than one year, along with the median price for the previous six months.

This would provide the market with a range of prices. Combined with the market knowledge of the circumstances that existed in the gas market over that six month period, this information may provide useful to parties. Posting of this information, rather than for each contract of duration of less than one year would lessen the administration for the storage providers. It is further recommended that the Board re-visit this issue 3 to 5 years after implementation and canvas market participants as to the value of this information. If it is found to be not useful, this requirement could be eliminated.

Sincerely,



Randy Aiken  
Aiken & Associates