

COMSATEC INC.

ENERGY MANAGEMENT

ELECTRICITY & NATURAL GAS

October 21, 2010

Via Email

Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ont.
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Attn: Ms. Kirsten Walli, Board Secretary

Re: Enbridge Gas Distribution Inc. 2011 Rate Adjustment Application EB-2010-0146

Comsatec is requesting to add the following issue, "Proposed changes to Enbridge billing requirements", to the list of issues addressed in this proceeding. While we realize that this issue may seem beyond the scope of the proceeding, the issue has significant cost implications on end-users and the resolution of the issue cannot wait until the end of the current IR agreement.

The problem is that there are ambiguities between the rate schedule and the method that Enbridge uses to manage its billing under these rates.

The situation arises when a customer has two contracts, one firm and the other interruptible. The firm rate usually has a minimum 50-80% load factor (or minimum volume that the customer must consume to qualify for the rate). Every month, the way it is billed is that the primary (firm) rate will be charged the CD x no. of days (that is 100% load factor billing) and the balance of the consumption is allocated to the other secondary (interruptible) rate. Due to this billing method, the customer will be penalized because the minimum volume for the secondary account was not met while the primary rate has exceeded the contracted minimum CD up to 100% (instead of 50 - 80%).

As a solution, we request that Enbridge bill at the minimum load factor for each day (50 - 80%, depending on the minimum load factor) and allocate the rest of the consumption for the day to the secondary (interruptible) rate in order to fulfill the contract requirements for both rates after making sure that the primary rate has met the minimum contracted volume. Monitoring the gas consumption for each rate with one meter is impossible and fair arrangement should be in place in order to meet the contract conditions.

Thank-you for your consideration in this matter.

Sincerely,



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