



**INFRASTRUCTURE SERVICES DEPARTMENT  
KITCHENER UTILITIES**

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**BY E-MAIL & COURIER**

December 18, 2012

Ontario Energy Board  
Attn: Ms. Kirsten Walli, Board Secretary  
P.O. Box 2319  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

**Re: EB-2010-0280 – Customer Service Amendments to the Natural Gas Reporting And Record Keeping Requirements (“Gas RRR”) – Notice of Proposal to Amend a Rule – Request for Extension to file Comments by the City of Kitchener (“Kitchener”)**

The Ontario Energy Board (“Board”) issued its Notice of Proposal to Amend a Rule (“Notice”) in the above noted proceedings on December 13, 2012. Among other things, the Notice invited comments from all interested parties with respect to proposed amendments to the Gas RRR that will require rate-regulated gas distributors to report on their application of the updated residential and eligible low-income customer service policies that they committed to in the EB-2010-0280 consultations. The Notice provided that these comments be submitted to the Board by January 18, 2012.

Also, at page 17 of its Notice, the Board stated:

*“The Board would encourage the non rate-regulated gas distributors to review the proposed Gas RRR amendments and indicate where they have, or could readily obtain, relevant data that they could then file. This will allow the Board to assess customer service policy trends across all gas distributors.”*

As a non rate-regulated gas distributor, Kitchener supports the Board’s intent to assess customer service policy trends across all gas distributors. However, given its more limited resources and personnel relative to the larger rate-regulated gas distributors, the extensive nature of the proposed amendments to the Gas RRR, and the imminent holiday season, Kitchener respectfully requests an extension of time to file its comments in response to the Notice to Friday, February 15, 2013. This four week extension will allow Kitchener to carefully review the proposed amendments and fully consider the extent to which it will be able to readily gather and file relevant data to satisfy the Board’s intent as noted above.

December 18, 2012

*Ms. Walli*

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We thank the Board for its consideration of this request for an extension to file our comments. If there are any questions or concerns, please do not hesitate to contact me and I will respond promptly.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Gruenbauer". The signature is stylized with a large, looped initial "J" and "G".

James A. Gruenbauer, CMA  
Manager, Regulatory Affairs and Supply

Cc: Parties to EB-2010-0280  
W. Malcolm (Kitchener)  
J. Chatterjee (Kitchener)  
N. Flatt (Kitchener)