

January 18, 2013

**Filed on RESS  
Sent By Courier**

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Board Secretary  
Ontario Energy Board  
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Dear Ms. Walli:

**RE: Customer Service Amendments to the Natural Gas Reporting and  
Record Keeping Requirements ("Gas RRR") – EB-2010-0280**

We represent Natural Resource Gas Limited ("NRG") and appreciate this opportunity to provide comments on the proposed Gas RRR amendments. NRG does have some general concerns with the proposed amendments.

While NRG believes the LEAP program is an excellent initiative and remains committed to helping those customers in need, the proposed low-income tracking system would be onerous for a distributor of NRG's size and means. NRG currently has one staff member who follows up with customers on late payments (at this point in time, tracking eligible low-income customer accounts would need to be performed manually). She works very hard with each and every customer to negotiate payment terms, steer individuals to the right government agencies and provide any other assistance she can to help them with their arrears. We believe this is an invaluable service that directly impacts our low-income customers.

It is unclear yet how much time will have to be spent tracking eligible low income customer accounts and meeting the other reporting requirements in the current proposal. It is most likely that NRG would need to hire additional staff, the costs of which would ultimately be borne by ratepayers. NRG estimates that there are only 60 eligible low-income customers and 7,000 total residential customers in its service area. In light of these small numbers – minute when compared to those served by Union (approx. 1.1 million low volume customers) or Enbridge (approx. 1.6 million low volume customers) – we do not believe that NRG's data will have an impact on the total data collected.

Given that such data collection will likely result in an increase in costs to the ratepayers, we request that NRG be exempt from these proposals. In the alternative, NRG reserves the right to apply for an exemption from certain reporting requirements based on the Board's final decision on these matters.

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Kirsten Walli  
January 18, 2013



Please feel free to contact us if you would like to discuss

Yours very truly,

***Original signed by***

John Beauchamp

JB/mnm