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January 6, 2005

Mr. John Zych
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Re: EB-2005-0545 -- Comments on the Proposed Amendments to GDAR

Dear Mr. Zych:

I am writing to provide the comments of Enbridge Gas Distribution Inc. ("Enbridge" or "the Company") on the proposed amendments to the Gas Distribution Access Rule which form Appendix A of the Notice of Amendment to a Rule issued by the Board on December 8, 2005.

The Company has no comments with respect to the proposed amendments numbered 1, 2 or 4.

Proposed amendment number 3 would have the effect of requiring gas distributors to accommodate VCB on January 1, 2007. This amendment is not appropriate as it is not consistent with the Board's findings and Decisions.


Section 6.1.2.3 of GDAR provides that gas distributors shall have the ability to accommodate gas vendor consolidated billing. Section 1.4.4 provides that S6.1.2.3 "shall come into force on March 1, 2004".

In the Board's Decision and Order of November 15, 2005, the Board cites, on page 4, paragraph 2a, from its Decision of September 13, 2005 that "the terms and conditions governing VCB need not be developed now, but should be negotiated between the parties in the event that the gas vendor requests that the gas distributor accommodate VCB." The Board goes on to state that "the Board remains of the view that this is appropriate, both for VCB and for split billing."

The Company therefore submits that there is no basis in the Decisions of the Board for the proposed amendment, which would require gas distributors to accommodate VCB on January 1, 2007.

Thank you for the opportunity to comment on the proposed amendment to the Rule. We would be pleased to respond to your questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Campbell". The signature is written in a cursive style with a large initial "R" and "C".

Richard J. Campbell
Manager, Regulatory Affairs
Enbridge Gas Distribution