



Shell Energy North America (Canada) Inc.  
90 Sheppard Avenue East, Suite 600  
Toronto, ON M2N 6Y2  
Phone 416-227-7300  
Fax 416-227-7330

via RESS and courier

October 19, 2009

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

**Re: EB-2009-0163  
Consultation on Proposed Changes to the Natural Gas Reporting and Record Keeping  
Requirements: Gas Marketer Licence Requirements**

---

Shell Energy North America (Canada) Inc. ("Shell Energy") submits these comments in response to the request issued by the Ontario Energy Board ("Board") on September 21, 2009.

Given the nature of the proposed changes, the Board and stakeholders would have benefited from a more informal consultation prior to the issuance of the current proposal. This may have addressed some of the concerns that will be raised, and narrowed the need for the filing of formal comments. It may have also provided stakeholders a better appreciation for the intended purpose of the changes and why implementation is desired within such a short timeframe. The proposed effective date of January 1, 2010 may not provide enough time for the consideration of concerns, and the implementation of process changes by gas marketers.

New section 2.1.2 needs to be qualified in the same fashion as section 2.1.1, with an explicit statement that the reporting requirements only apply to the business activities of the gas marketer related to low volume consumers. This currently voluntary information is appropriately only requested as it relates to low volume consumers, and this practice should continue.

Sincerely,

*original signed*

Paul Kerr  
Manager, Market Affairs  
Shell Energy North America (Canada) Inc.

90 Sheppard Avenue East, Suite 600  
Toronto, ON M2N 6Y2

direct phone: 416-227-7312  
direct fax: 416-227-7342  
email: [paul.kerr@shell.com](mailto:paul.kerr@shell.com)