



**INFRASTRUCTURE SERVICES DEPARTMENT  
KITCHENER UTILITIES**

James A. (Jim) Gruenbauer, CMA  
Manager, Regulatory Affairs & Supply  
Kitchener Operations Facility – Utilities Division  
131 Goodrich Drive  
Kitchener, Ontario, Canada, N2C 2E8  
Phone: 519-741-2600 ext 4255  
Cell: 519-580-3568  
Fax: 519-741-2633  
TTY: 1-866-969-9994  
e-mail: jim.gruenbauer@kitchener.ca

**BY E-MAIL & COURIER**

July 15, 2011

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 Standards for Natural Gas Distributors – Proposed Amendments to GDAR – Comments by the City of Kitchener (“Kitchener”)**

In response to the Ontario Energy Board’s (“Board’s”) Notice of Proposal to Amend a Rule (“Notice”) dated June 29, 2011, Kitchener respectfully provides the following brief comments, with our appreciation for the opportunity to do so.

Kitchener is grateful for the Board’s finding of merit in the positions of the Responding Distributors (including Kitchener) with respect to maintaining some flexibility over gas distributor customer service standards and practices at this time. Kitchener notes the Board’s adoption of a less prescriptive approach is predicated on natural gas distributors amending their respective standards and practices in pursuit of improved customer service. This improvement is and will remain a focus for Kitchener.

While the proposed amendments to the GDAR are mandatory for the rate-regulated natural gas distributors, Kitchener is prepared to voluntarily comply in a timely fashion with aspects of the proposed amendments to the extent it can, given its resources and far smaller scale and scope of operations relative to the other Responding Distributors.

For example, Kitchener is prepared to post its Customer Service Policy for residential customers on its web site, although this cannot be done by the August 31, 2011 in force date of the proposed amendments to GDAR due to the resource constraints noted above. However, Kitchener respectfully submits that targeted and cost effective efforts to voluntarily comply with aspects of the proposed amendments would benefit its residential customers and provide an appropriate degree of consistency with the customer service standards and practices of the rate-regulated gas distributors.

July 15, 2011

*Ms. Walli*

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Kitchener hopes these comments are helpful to the Board.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Gruenbauer". The signature is stylized and cursive.

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

Cc: W. Malcolm (Kitchener)