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File: 6706

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October 9, 2015

Ontario Energy Board
P.O. Box. 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Attention: Kristen Walli, Board Secretary

Dear Ms. Walli:

**Re: Board File No. EB-2015-0029/EB-2015-0049
OSEA Response to Undertakings**

OSEA wishes to make clear that it has fulfilled all of the Undertakings in this hearing.

On September 18, 2015 OSEA wrote to counsel for APPrO stating that OSEA had fulfilled the Undertaking and no further information was required for the Undertaking. We have enclosed a copy of the September 18, 2015 email.

APPrO did not respond. Yet, APPrO's final arguments at paragraph 68 state that Mr. Young's Undertaking to APPrO was left unanswered.

OSEA's position remains that the Undertaking has been fulfilled. Further, OSEA views this matter as closed.

Yours truly,

Joanna Vince

Encl.

cc. Nicole Risse, Executive Director, OSEA
Intervenors

Document #: 899433

Amy Gilbert

From: Joanna Vince
Sent: Friday, September 18, 2015 8:28 AM
To: 'Lisa DeMarco'
Cc: Robert Woon; 'Cary Ferguson'; 'Joanna Kyriazis'
Subject: RE: Union and Enbridge - 2015-2020 DSM Plans (EB-2015-0029 / EB-2015-0049)

Good morning Lisa,

OSEA will not be providing any further information for interrogatory M.OSEA.APPrO.2 or undertaking JT3.11.

The information already provided is the best available to Mr. Young. In response to undertaking JT3.11, Mr. Young, using best efforts, provided the references to documents, data and reports **that he relied on**. Further, Mr. Young states that any increase or decrease in emissions could result from a number of initiatives that may not be tied to DSM programs. Mr. Young is also clear that the data requested is outside the scope of his evidence.

The tables created by APPrO in interrogatory M.OSEA.APPrO.2 would require Mr. Young to obtain data that is not available and perform calculations that are outside the scope of his review and evidence.

Mr. Young's sole reference to greenhouse gases is that Ontario's challenge is moving beyond coal, followed by a quote from the Environmental Commissioner of Ontario. The tables prepared by APPrO do not serve to clarify OSEA's evidence, simplify issues, permit a full understanding of the matters or expedite the proceeding. The tables prepared by APPrO would require Mr. Young to go beyond his evidence and the scope of his review to locate new information (much of which is not available to Mr. Young), perform new calculations and create new evidence, all outside of the scope of his review and evidence in this hearing.

In his examination, Mr. Young was clear that he did not perform any calculations on costs or cost effectiveness.

OSEA's view is that the undertaking has been fulfilled. Mr. Young made best efforts to provide pinpoint references **to the report he relied on**. Further, Mr. Young made best efforts to provide the information/data for the final three columns of the second APPrO table.

In an attempt to resolve this matter, OSEA would be agreeable to taking the response provided in undertaking JT3.10 and inserting it into the last three columns of APPrO's second table. If this is acceptable to APPrO, kindly let me know and OSEA will refile the response to undertaking JT3.11 with the information already provided in table format.

Regards,

Joanna



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