

11 May 2018

Ontario Energy Board
2300 Yonge St., 27th Floor
Toronto, ON, M4P 1E4

Attn: Ms Kirsten Walli, Board Secretary

By electronic filing and e-mail

Dear Ms Walli:

**Re: EB-2017-0127/0128 – DSM Mid-Term Review
EB-2017-0224/0255 – Enbridge Gas Distribution Inc. (“Enbridge”) and
Union Gas Limited (“Union”) 2018 Cap and Trade Compliance Plans**

I write on behalf of the Green Energy Coalition (GEC) in support of the request in this matter made by Mr. Elson in his letter of May 9th on behalf of Environmental Defence.

GEC is concerned that the utilities have failed to adequately consider and provide the Board with options for incremental ratepayer funded DSM in both the Cap and Trade compliance plans and in their Mid-Term DSM Review filings.

In the C&T case the companies have all but eliminated the option of added DSM by limiting their review to a comparison of current DSM (at an aggregate level) to the business as usual scenario in the MACC. Whether or not that approach was justified given the Board’s C&T Framework and the current MACC is a matter for argument in that proceeding. However, it is not in dispute that in taking that approach the companies have not considered specific opportunities where improved program design (rather than business as usual) could cost-effectively abate.

In the DSM mid-term review filings the companies have held to the Board’s rate impact cap (apart from their concern about targets increasing without corresponding program budget increases). That approach ignores the new imperatives and costs of cap and trade or carbon taxes. While the companies have asked that carbon costs be added to avoided costs, without addressing the budget constraint and without analysing incremental opportunities the mid-term review panel will have nothing tangible to consider in regard to C&T driven customer abatement.

Accordingly, as set out by Mr. Elson, if the Board does not act expeditiously to require the companies to present alternative C&T customer abatement options the 2019 compliance period activity will similarly be based on incomplete analyses with corresponding costs to ratepayers.

We understand that the companies prefer C&T driven DSM to be considered within the DSM Framework. If the Board is persuaded to require such analyses in the mid-term review proceeding, we would request that the process for that review be altered to enable a proper testing of the utility proposals and a consideration of any needed revisions to the framework to accommodate C&T driven conservation. To ensure that the Board has a sufficient record upon which to rule, we would suggest that the utilities be asked to provide a range of options for a range of budgets and that proposals not be limited to the 'business as usual' scenario that is a limitation in the current MACC.

Alternatively, if the Board concludes that the C&T compliance reviews are the appropriate process, then, given the timing of the next C&T filing, we ask that the panel hearing the current application consider issuing a preliminary ruling to ensure that the 2019 filings include a proper analysis on a timely basis that is not limited to 'business as usual'.

Sincerely,

A handwritten signature in black ink, appearing to read "David Poch". The signature is fluid and cursive, with a large, stylized initial "D" and "P".

David Poch
Cc: all parties