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August 31, 2018

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

Dear Ms. Walli:

Re: EB-2017-0127 / EB-2017-0128 – Mid-term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors ("DSM Mid-Term Review")

We are counsel to the Association of Power Producers of Ontario (**APPrO**) in the DSM Mid-Term Review.

APPrO is in receipt of the August 21, 2018, letter from Mr. Elson on behalf of Environmental Defence and the Green Energy Coalition requesting "that another day be added to the stakeholder meeting agenda for stakeholder presentation and discussions". It has also received the letters filed on behalf of Union Gas Limited (**Union**) and Enbridge Gas Distribution Inc. (**Enbridge**) opposing the request and the related letters from various intervenors.

The Union letter notes that Union:

- i. is concerned that the additional topics put forward by Mr. Elson for consideration as part of the DSM Mid-Term Review amount to fundamental changes to the Union and Enbridge's Board-approved 2015-2020 DSM Plans including changes to incentives, programs and scorecards, as well as fundamental changes to the Board's 2015-2020 DSM Framework, in direct contradiction to the guidance outlined by the Board;
- ii. believes that such fundamental changes warrant "fulsome consideration and review by all relevant stakeholders", should be considered through a transparent regulatory process, and are not therefore well-suited for the September 6, 2018, stakeholder meeting; and
- iii. believes that the topics put forward by Mr. Elson are better suited for consideration as part of the development of the next DSM Framework.

The Enbridge letter also notes that:

- i. none of the additional topics raised by Mr. Elson are within the scope of the matters identified by the Board in its January 20, 2016, Decision and Order in the Multi-Year DSM proceeding;
- ii. the review and consideration of the additional topics raised by Mr. Elson should be more appropriately dealt with at the proceeding dealing with the development of the next DSM Framework; and
- iii. the September 6, 2018, stakeholder meeting should be limited to the topics and the procedures set out in the Board's letter dated August 15, 2018.

APPrO shares a number of the concerns set out by Union and Enbridge. Specifically, APPrO and its gas-fired electricity generator members (**GFGs**) participated actively in the Multi-Year DSM Proceeding and rely upon the Board's decisions, processes, and timelines set out therein to govern the scope and nature of this mid-term review, which is properly limited in scope by the DSM Decision. In no way should APPrO's or any other party's legitimate expectation of a procedurally fair process be compromised by changing procedures and an expanded scope. APPrO submits that any such expansion is prejudicial to GFGs who have relied on the DSM Decision to prudently plan and undertake conservation investments and activities. APPrO therefore requests that the Board proceed as intended in accordance with the scope, processes, and timelines set out in the Board's August 15, 2018, letter and the DSM Decision.

Sincerely,



Lisa (Elisabeth) DeMarco

cc. David Butters
John Wolnik