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September 28, 2018

Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: LIEN's Comments – DSM Mid-Term Review
Board File Nos. EB-2017-0127 and EB-2017-0128**

The Low Income Energy Network (LIEN) provides the following comments regarding Enbridge Gas Distribution Inc. (“Enbridge”) and Union Gas Limited (“Union”)’s submissions as part of the DSM Mid-Term Review.

LIEN’s primary objective is to ensure affordable energy for low-income residents of Ontario while encouraging sustainable and renewable energy initiatives and conservation of energy use. LIEN supports DSM programming, particularly DSM programming specific to low-income natural gas consumers in Ontario. DSM not only reduces natural gas use but mitigates impacts to low-income and other consumers’ bills.

LIEN sees Enbridge and Union’s DSM programs as more important than ever now that Ontario intends to cancel Ontario’s Cap & Trade program through Bill 4, *Cap and Trade Cancellation Act*, 2018. Union and Enbridge were in the planning stages of implementing greenhouse gas (GHG) abatement initiatives (*albeit* in their beginning stages) under their respective 2018 Cap & Trade Compliance Plans; initiatives that would be incremental to, not duplicative of, the Utilities’ DSM programs.

However, now that Cap & Trade will be cancelled and the funding mechanisms thereunder (GreenON and related funds) will not be renewed, reduction of natural gas consumption (and the corresponding reduction in GHG emissions and consumers’ bills) is left to the Utilities’ DSM programs.

LIEN generally supports the Utilities’ Low-Income DSM offerings and the work completed thus far as part of the Utilities’ 2015-2020 DSM Plans to implement these offerings.

LIEN also supports early planning for post-2020 DSM (as do the Utilities and some, if not all, intervenors), including the following:

- 1 the Utilities should be and are starting to plan now for DSM programs for the next DSM Plan term
- 2 stakeholder meetings with the Utilities should be held well in advance of expiration of the current DSM term (2015-2020), to avoid rollover of programs as we saw with 2014 into 2015 DSM programs, and
- 3 the Board should consider mechanisms to mandate these next steps with timelines starting in early 2019.

LIEN notes that in the Board's Decision and Order in EB-2015-0029/0049, the Board encouraged the Utilities to consider new low-income program opportunities at the Mid-Term Review:¹

In addition, as the utilities learn more about this customer segment, new low-income program opportunities could be considered at the mid-term review.

Despite this direction from the Board, neither of the Utilities have considered new low-income-specific offerings as part of their submissions in the Mid-Term Review process.

LIEN recommends that the Board require that the Utilities consider this and present their proposed plans for new low-income programs as part of stakeholder meetings and submissions in 2019 as the Utilities prepare for DSM post-2020.

SPECIFIC COMMENTS ON UNION'S STAKEHOLDER PRESENTATION AND PROPOSED RECOMMENDATIONS

LIEN supports Union's proposed approach to screen cost-effectiveness at the program level, rather than at the offering level. Union expects that by "screening at the program level, more energy conservation offerings are eligible to be provided to customers, while ensuring the program remains cost-effective".² LIEN is concerned that Low-Income offerings such as the new Low-Income Furnace offering will be removed from Union's DSM Low-Income Program if screening at the program level for cost-effectiveness. Union's Low-Income Furnace offering is in its infancy (new this DSM Plan period). LIEN expects that Union will learn from its efforts to implement this program during the 2015-2020 term and may have much ground to cover to ensure that this offering can be effectively implemented to low-income consumers in Ontario in this and the next DSM Plan term.

¹ EB-2015-0029/0049, Decision and Order, p 24.

² Union Presentation at Stakeholder Meeting on September 5, 2018.

LIEN is supportive of Union's proposal to launch a Residential Adaptive Thermostat offering and Joint DSM/CDM residential offering for air conditioner and electric appliances rebates. LIEN expects that these new residential offerings will assist residential single family low-income customers (as well as residential as a whole) in reducing electricity consumption and mitigating electricity bills. LIEN appreciates Union's proposal to allow for this offering to be paired with Union's current furnace and insulation upgrades through a single offering and to be administered through Union only. This promotes administrative efficiency and reduces confusion for customers.

LIEN does not support Union's proposal to decrease its conservation targets by 10%³, and instead supports the Board's original direction to increase targets by 10%⁴. Union's reasons for this reduction relate entirely to and rely on the existence of the Cap & Trade Program, which is in the process now of being cancelled. Without Cap & Trade, there are no incremental DSM or GHG abatement offerings available in Ontario that will fund DSM/conservation, nor are any anticipated in the foreseeable future.

SPECIFIC COMMENTS ON ENBRIDGE'S STAKEHOLDER PRESENTATION AND PROPOSED RECOMMENDATIONS

LIEN supports Enbridge's efforts to reach out to and implement Enbridge's Low-Income offerings and acknowledges the difficulties Enbridge and its service providers face in reaching low-income customers, particularly Part 9 customers.⁵ LIEN looks forward to working with Enbridge to discuss ways to improve access and outreach and recommends that LIEN and its members (social service agencies) discuss this with Enbridge to assist as Enbridge continues to implement its 2015-2020 DSM Plan and as Enbridge prepares its post-2020 DSM Plan.

LIEN is also supportive of Enbridge's work with IESO to develop a pilot to assess a potential combined electricity and natural gas residential program (the Whole Home Pilot), much like the work that Union and IESO have done with their Residential Adaptive Thermostat offering and Joint DSM/CDM residential offering.

³ Union Submission Part One dated September 1, 2017 at pp 16-20.

⁴ EB-2015-0029/0049, Decision and Order, p 66.

⁵ Enbridge Stakeholder Presentation on September 6, 2018.



LIEN does not support Enbridge's proposal to decrease its conservation targets by 10%⁶. As stated above, LIEN supports the Board's original direction to increase targets by 10%, for the reasons set out further above.

Yours truly,

A handwritten signature in blue ink, appearing to read "Matt F. Gardner". The signature is fluid and cursive.

Matt Gardner

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⁶ Enbridge Submission Part Two dated January 15, 2018 at pp 19-20.