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May 20, 2009

VIA E-MAIL

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

Re: EB-2008-0103 EGD I 2009 DSM Input Assumptions
EB-2009-0102 Union Gas 2009 DSM Input Assumptions
Comments of the Vulnerable Energy Consumers Coalition (VECC)

As Counsel to the Vulnerable Energy Consumer's Coalition (VECC), I hereby provide the following Comments on the update of EGD I and Union DSM input Assumptions for 2009.

We have had an opportunity to review the comments provided by Mr. V. DeRose counsel to the Canadian Manufacturers and Exporters.

VECC supports the sentiments expressed in his letters regarding the role of the EAC and the process used by EGD I and Union in responding to the Board's initiative and the lack of confidence that this engenders among stakeholders. We agree that for 2009 it would be appropriate for the Board to require that EGD's 2009 SSM be based upon best available information at the time of the 2009 audit. This is already the requirement in the Board's Guidelines for Electric CDM.

VECC notes that in regard to Low Income DSM programs for 2009, the review of framework issues by the LEAP Working Group could alleviate some of the concerns about the use of best available assumptions for this segment, provided there is a follow up to address best available assumptions at a specific measure level.

Yours truly,

Original signed

Michael Buonaguro PIAC
Counsel to VECC