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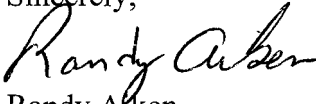
Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

**Re: EB-2009-0166 – Submissions of the London Property Management Association –
Union Gas Limited 2010 Natural Gas Demand Side Management Plan**

Please find attached the submissions of the London Property Management Association in the above noted proceeding.

Sincerely,



Randy Aiken
Aiken & Associates

cc Chris Ripley, Union Gas

IN THE MATTER OF the *Ontario Energy Board Act 1998*,
S.O. 1998, c.15, (Schedule B);

AND IN THE MATTER OF an application by Union Gas
Limited for approval of its 2010 Natural Gas Demand Side
Management Plan.

**SUBMISSIONS OF THE LONDON PROPERTY
MANAGEMENT ASSOCIATION**

I. INTRODUCTION

This is the argument of the London Property Management Association (“LPMA”) related to the application of Union Gas Limited for an order granting approval of its 2010 Natural Gas Demand Side Management (“DSM”) Plan.

The current DSM plan is a 3 year plan that expires on December 31, 2009. The Board initiated EB-2008-0346 to develop guidelines which would be used for the next multi-year DSM framework.

On April 14, 2009, the Board issued a letter directing natural gas distributors to file a one year DSM plan for 2010 and noted that it expected the 2010 DSM plan to file under the current DSM framework. This step was taken in light of the uncertainty related to the Green Energy Act.

On May 13, 2009, the Board issued a letter directing the distributors to remove programs related to low income energy consumers from the 2010 DSM plans. These programs will be addressed through the Low Income Energy Assistance Program Conservation Working Group (EB-2008-0150).

II. CONSISTENCY WITH CURRENT DSM FRAMEWORK

LPMA agrees that with the exceptions noted below Union has filed a 2010 DSM plan that is based on the existing DSM framework established in EB-2006-0021.

As indicated in the response to an interrogatory from Board Staff (Exhibit B1.1), Union has only deviated from the existing framework except for the reduction of budgets and targets related to the Low Income programs. The Board directed Union to remove these programs from its 2010 DSM plan in its May 13, 2009 letter.

Union has used the assumptions from the EB-2008-0346 Navigant Report as the starting point for the 2010 assumptions, with only a few exceptions (Exhibit B5.2). These exceptions are the addition of free riders that are based on the best available information currently available. Navigant did not include free riders in its report. Union has also added two additional measures that were not previously included in its input assumptions (2010 DSM Plan, page 7). LPMA accepts these measures and assumptions, subject to any comments from other intervenors in this proceeding.

Union indicates that it would file any changes to measure or inputs relative to those included in Appendix B to its 2010 DSM Plan prior to 2010 as appropriate. Union indicates that changes may result from new measures being brought forward or updated evaluation work. LPMA submits that if any changes are brought forward prior to 2010, the Board should allow all parties to review the proposed changes.

III. MARKET TRANSFORMATION PROGRAM

LPMA is concerned that Union has set its targets too low for the market transformation associated with Drain Water Heat Recovery (“DWHR”) program. These targets are shown in 100% column in Table 5 on page 31 of the 2010 DSM Plan.

The target related to Ultimate Outcomes – Participating Builders is a total of 90 builders. As shown in Exhibit B3.5, the actual number of participating builders has risen from 20 in 2007 to 51 in 2008, with a target of 71 in 2009. However, as shown in the response to Exhibit B5.6, part (b), Union has already exceeded this target in 2009, with 74 participating builders as of July 30, 2009. Based on this growth in the number of builders, and surpassing the 2009 target with 5 months remaining in the year, LPMA submits that the target of 90 participating builders is too low. LPMA submits that the

target should be raised to at least 100. The number of participating builders has rise by 23 in 2009 (year-to-date) from 2008. The addition of 23 builders to the current level of 74 results in 97 participating builders. A target of 100 is, therefore, reasonable as it simply represents the continued increase in the number of builders in 2010 at the same rate as in 2009.

The target related to Ultimate Outcomes – Units Installed as a percentage of 2010 housing starts is, in the opinion of LPMA, also too low. The target is only 14.0%. As shown in the response to Exhibit B3.5, the 2007 actual percentage was 4.8%, growing to 8.4% in 2008 and with a target of 12% in 2009. Based on this growth of 3.6 percentage points in 2008 and in the target for 2009, LPMA submits that the target for 2010 should also reflect a 3.6 percentage point increase from the 12% target in 2009 to a target of 15.6% in 2010.

The Market Effects – Customer Awareness Survey has a target of an increase of 6 percentage points above the 2009 level. However, has shown in the response to Exhibit B5.6, part (e), the target for 2009 was 8 percentage points above the actual 2008 level. LPMA submits that the target for 2010 should reflect the same increase in 2010 as was used in 2009, 8 percentage points. There is no reason for the target increase to be lower in 2010 than it was in 2009.

Similarly, Union has a target of a 6 percentage point increase in the Market Effects – Builder Knowledge Survey from the 2009 level. However, again as shown in Exhibit B5.6, part (f), the 2009 target was 8 percentage points above the actual 2008 level. LPMA submits that the 2010 target should be the same 8 percentage point increase in 2010 as it was in 2009.

IV. BEYOND 2010

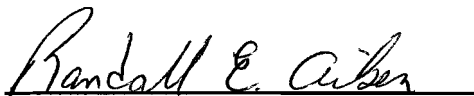
As noted earlier, the current Board approved DSM plan is a 3 year plan that expires at the end of 2009. The 2010 plan is an extension of the 3 year plan that is due to the uncertainty created by the Green Energy Act.

LPMA submits that the Board should not adopt any further extension to the 3 year plan that came out of the DSM Generic Proceeding (EB-2006-0021). The Decision in that proceeding was released in August, 2006. Much has changed since then with respect to conservation in the province. There is now wide spread public expectation that governments and businesses alike should promote energy conservation as part of their normal course of business. LPMA submits that the level of budgets, the level of SSM (if any), and the type of energy conservation measures undertaken should be reviewed in detail as part of a generic hearing as soon as possible and certainly no later than to implement effective programs for the beginning of 2011.

V. COSTS

LPMA requests that it be awarded 100% of their reasonably incurred costs of participating in this proceeding.

All of which is respectfully submitted this 12th day of August, 2009.

A handwritten signature in cursive script that reads "Randall E. Aiken". The signature is written in black ink and is positioned above a solid horizontal line.

Randall E. Aiken
Consultant to
London Property Management Association