

ONTARIO ENERGY BOARD

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 Enbridge Gas
Distribution Inc. for approval of its 2010 Natural Gas
Demand Side Management Plan.

SUBMISSIONS OF THE LOW-INCOME ENERGY NETWORK (LIEN)

November 20, 2009

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AND TO: **ALL REGISTERED PARTICIPANTS**

SUBMISSIONS

1 . OVERVIEW

1 In its September 18th letter with respect to Status of Initiatives Relating to Low-Income Energy Consumers and Further Direction to Electricity and Natural Gas Distributors, the Ontario Energy Board (Board) recognized that, while the Ministry of Energy and Infrastructure's (Ministry) province-wide low-income program is in development, financial assistance should continue to be available to consumers in need, particularly during the winter season.

2 As a result, the Board has determined that 2010 will be a bridge year between the current natural gas DSM framework set in 2006 (EB-2006-0021, the Generic DSM Proceeding) and the next generation DSM framework. The Board has also approved Enbridge's 2010 DSM Plan, with the exception that the Board directed the removal of the specific budgets and targets for low-income energy consumers to be dealt with in this part of the proceeding. This limits the purview of this part of the proceeding and therefore, the concerns that LIEN and other intervenors can express are similarly constrained. LIEN continues to be of the view that any programs provided to low-income consumers should be multi-faceted, focus on deep measures, and have broad geographic reach. These programs should address effectively the issues and specific barriers to energy efficiency that this market segment faces.

2 BUDGET

3 Under the Board approved framework established in EB-2006-0021
Enbridge is required to spend a minimum of 14% of the residential DSM budget
on low-income DSM. In their 2010 low-income DSM plan and in Exhibit I, Tab 8,
Schedule 1, Page 2 of 2 of the interrogatory responses Enbridge indicates that it
will spend 20% of the residential DSM budget on low-income programs. LIEN is
pleased with and supports Enbridge's proposed budget for low-income DSM in
2010. This level recognizes the urgent need for low-income DSM programming
in Enbridge's franchise areas and the inaccessibility of existing federal and
provincial residential energy efficiency programs (ecoENERGY for Homes –
Retrofit and Home Energy Savings programs) for low-income energy consumers
because of the requirement for a significant upfront capital investment.

3 PROGRAM COVERAGE – NUMBER OF COMMUNITIES

4 In Exhibit I, Tab 7, Schedule 1, Page 1 of 1 of the interrogatory responses
Enbridge indicate that it will increase the number of participants in the
Weatherization program by 18%. However, Enbridge also indicates that there will
be no expansion of the program to other communities in their service territory in
2010.

5 In Exhibit I, Tab 7, Schedule 2, Page 1 of 2 of the interrogatory responses
Enbridge indicates increasing the low-income DSM budget in 2010 would allow
Enbridge to expand the program into other areas of the franchise (such as
Barrie).

6 As a condition of approval, LIEN urges the Board to require Enbridge to expand the Weatherization program to at least one other community in its franchise area in 2010, by reallocating some of its requested low-income DSM budget to accommodate this expansion.

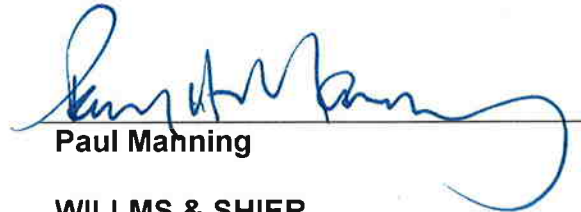
4 SOLAR THERMAL WATER HEAT PROGRAM

7 LIEN supports Enbridge's proposal to provide a solar thermal water heat pilot program to social housing residents in which the full cost of solar thermal equipment and installation, after all third-party rebates are applied, is covered. LIEN also supports Enbridge's proposal to work with Social Housing Services Corporation (SHSC) to identify 200 candidate low-rise social housing residential buildings in Enbridge's service territory that meet the structural and orientation requirements for solar thermal installations and to develop suitable training and education programs. These programs will ensure that the solar thermal equipment is installed and maintained properly, to ensure maximum productive life of the equipment.

8 Testing solar hot water heating in social housing is appropriate as this market is easier to reach than the private rental market (about 60% of low-income consumers live in the private rental market) and therefore, is an appropriate market segment to test this technology. Once solar hot water heating is tested in this market, then Enbridge can consider partnerships with the private rental market, which is harder to address due to the more complex

landlord/tenant issues. Testing solar thermal water heating applications in this time frame will take advantage of existing federal and provincial subsidies as well as provide information to assist low-income housing providers in looking at options for more expensive photovoltaic installations under the new feed-in tariff program offered by the Ontario Power Authority.

Dated: November 20, 2009



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