

November 20, 2009

Ms. Kirsten Walli, Board Secretary  
**ONTARIO ENERGY BOARD**  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: EB-2009-0154: Enbridge Gas Distribution Inc. (EGD) 2010 Low Income DSM Plan.**

We write as counsel to the Industrial Gas Users Association (IGUA).

We have reviewed EGD's 2010 low-income DSM plan filing, and interrogatory responses. Given EGD's confirmation (Phase II Ex. I/T6/S1) that its 2010 low-income DSM plan, including its proposed incremental market transformation (solar water heating) initiative, will have no impact on industrial gas distribution customers, IGUA takes no formal position on this phase of EGD's 2010 DSM application.

The fact that IGUA takes no formal position herein should not be construed as acceptance of the principles underlying EGD's low-income proposal. In particular, IGUA has general concerns regarding the planning principles reflected in the proposed low-income market transformation (solar water heating) initiative. IGUA is generally concerned that EGD's market transformation programs are; i) designed and launched without sufficiently defined market transformation objectives or "business plans" (also sometimes referred to as "logic models"); and ii) evaluated with metrics that, in some cases, do not properly track or reflect the degree of market transformation realized. IGUA's interrogatories reflected these concerns (see Phase II Ex. I/T6/S2).

IGUA is also concerned that, as in EGD's main 2010 DSM plan earlier ruled on by the Board, EGD is proposing a significant incremental expenditure, above and beyond the Board's pre-determined escalated low-income DSM budget, for a new low-income program in an interim year (between the previous DSM framework and the next one).

While IGUA wishes to document the foregoing concerns through this letter for future reference, as noted at the outset of this letter the low-income DSM programs have no impact on industrial customers, and so IGUA is not raising formal objection to EGD's proposal.

Yours truly,  
MACLEOD DIXON LLP

A handwritten signature in dark ink, appearing to read "I. Mondrow" with a stylized flourish at the end.

Ian A. Mondrow

c. Murray Newton, IGUA  
Intervenors of Record

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