



Low-Income Energy Network

September 2, 2010,

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: Enbridge Gas Distribution 2011 Demand Side Management (DSM) plan (EB-2010-0175)

The Low-Income Energy Network (LIEN) represents more than 40 member groups across Ontario. As a network representing the intersection of interests related to low-income consumers and energy and sustainability, LIEN's focus is on reducing the energy bills of all low-income consumers. This helps to ensure that all low-income consumers across Ontario have access to conservation programs, technologies and services as well as conservation education, and realize the environmental, energy and economic benefits associated with the more efficient use of energy. To achieve these objectives, low-income consumers require a comprehensive array of assistance that includes: aggressive DSM defined as providing deep energy savings per low-income consumer and broad consumer participation across the province, consumer protection policies and education, bill assistance, and emergency financial assistance. In addition to being an approved intervenor in this proceeding, LIEN is also an active member of Enbridge's DSM Consultative.

On May 28, 2010 Enbridge Gas Distribution (Enbridge) filed an application with the Ontario Energy Board (Board) seeking approval of its 2011 Natural Gas Demand Side Management (DSM) Plan. As requested by the Board this plan follows the natural gas DSM framework set in 2006 (EB-2006-0021, the Generic DSM Proceeding). In Procedural Order No. 1, the Board requested written comments and interrogatories on this application (Enbridge's 2011 DSM Plan). LIEN filed written interrogatories on August 3, 2010. This submission represents LIEN's comments on Enbridge's 2011 DSM Plan.

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LIEN recognizes that 2011 is an interim year for DSM and expects that Enbridge will take a more aggressive approach to DSM in 2012 with the implementation of the Board's new gas DSM guidelines.

In response to Board Staff Interrogatory #3, Enbridge indicated that it is looking for a Board sponsored process to file a supplemental document outlining its final plan for the 2011 low-income programs and that it has initiated a consultation that includes LIEN and other stakeholders to develop this low-income plan. LIEN is pleased with this consultation process to date as it is a step towards expeditiously and effectively implementing the Minister of Energy's new direction for DSM as stated in his July 5, 2010 letter. LIEN therefore supports Enbridge's request for a Board sponsored process to file the supplemental low-income plan for 2011. To that end, LIEN recommends that a condition of approval be added to the approval of the 2011 DSM as filed which mandates the development and filing of a supplemental document outlining Enbridge's final plan for the 2011 low-income programs, to be filed by the end of October 2010, and prepared in consultation with stakeholders.

Thank you for the opportunity to make this submission to the Board.

Sincerely,



Zee Bhanji
Coordinator
Low-Income Energy Network