

By Electronic Filing and By E-mail

September 2, 2010

Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street 27th floor Toronto, ON M4P 1E4 Borden Ladner Gervais LLP
Lawyers • Patent & Trade-mark Agents
World Exchange Plaza
100 Queen Street, Suite 1100
Ottawa ON K1P 1J9
tel.: (613) 237-5160 fax: (613) 230-8842
www.blgcanada.com

VINCENT J. DEROSE direct tel.: (613) 787-3589 e-mail: vderose@blgcanada.com

Dear Ms Walli

Enbridge Gas Distribution Inc. ("EGD")

2011 Natural Gas Demand Side Management ("DSM") Plan

Board File No.:

EB-2010-0175

Our File No.:

339583-000077

We are writing on behalf of Canadian Manufacturers & Exporters ("CME"). In addition to reviewing EGD's 2011 DSM Plan Application, CME was also an active member of the DSM Consultative. As the Board will be aware, many of the issues raised by EGD's 2011 DSM Plan were discussed within the DSM Consultative.

Subject to the single issue described below, CME supports EGD's 2011 DSM Plan.

As the Board is aware, members of EGD's DSM Consultative rely upon members of the Evaluation and Audit Committee ("EAC") to oversee various aspects of DSM delivery. One of these areas is the continual updating of various DSM assumptions.

IGUA has been one of the members of EGD's EAC for the 2008 and 2009 program years. To this end, in its correspondence of earlier today, IGUA has raised a concern with respect to the 5% free ridership assumption included by EGD for its Energy Star for New Homes Program. As identified by IGUA, for the purposes of 2009 LRAM and 2010 TRC result calculations, EGD accepted a 48% free ridership rate for this Energy Star Program.

On this basis, CME urges the Board to direct EGD to modify the free ridership rate for this program to 48% for 2011.

If you have any questions or concerns, please contact me at your convenience.

Yours very truly,

Fig Vincent J. DeRose

VJD/kt

c. Norm Ryckman (EGD)
Paul Clipsham (CME)

OTT01\4179449\1