

September 10, 2010

Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Attention: Ms. Kirsten Walli - Board Secretary

Re: EGDI's 2011 DSM Plan - EB-2010-0175

Dear Ms. Walli:

Toronto and Region Conservation (TRCA) is pleased to provide this written support for EGDI's 2011 DSM Plan. We see no reason for an oral hearing.

In particular, TRCA wishes to commend EGDI on the Support for Operational Improvements (M&T) component of its Custom Resource Acquisition Program for Large Commercial (Exhibit B, Tab 2, Schedule 4). Since 2007 EGDI has been deploying this initiative to support a number of TRCA's performance-based conservation programs, enabling substantial, documented gas savings which would not otherwise be captured. 3,200,000 m3 total gas savings were recorded in 2009 across 18 organizations, with 125 hospitals, municipal buildings, office buildings and schools recording savings of 5% or more. Through the continuous engagement and energy use reporting provided by these programs, gas savings have been sustained and grown over the years as more organizations and buildings take part, and as participants go deeper, continuously improving approaches and sharing best practices. The remarkable success of SickKids Hospital was cited as but one example of the power of this approach in our previous submission to EB-2008-0346 DSM Guidelines - Concentric Report. Greening Health Care, the program of which SickKids is a member, has also successfully integrated electricity and water conservation incentives to create a comprehensive approach to conservation.

That submission described and proposed performance-based conservation as a pillar of the next generation DSM framework for Ontario. The approach promises deeper savings at lower cost, an improved methodology for estimating conservation potential and verifying actual energy savings achieved, and ongoing, multi-year engagement of building owners and managers to help entrench the culture of conservation in Ontario. Performance-based programs also provide a natural forum for gas distributors and LDC's to collaborate in supporting comprehensive conservation action.

In this context, and recognizing 2011 as the bridging year to the next generation DSM framework, TRCA recommends that, within EGDI's proposed 2011 program and budget envelope, priority be given to:

- The extension of this Support for Operational Improvements (M&T) programming to the Multi-family Sector as contemplated in the 2011 DSM Plan (Exhibit B, Tab 2, Schedule 5)
- Raising participation rates in established performance-based programs – more organizations and buildings create a virtuous cycle leading to ever-greater gas savings
- Deeper savings – support for ongoing development of management processes, methodology and tools which identify and deliver ever-greater gas savings
- Collaboration – actively engaging Union Gas, LDC's and water distributors in supporting performance-based programming in Ontario

We look forward to another successful year of DSM programming, and to the establishment of the new DSM framework for Ontario which can build upon the successes of the past few years, and thereby deliver broader and deeper gas savings than have been achieved so far.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Brian Denney".

Brian Denney, P.Eng.
Chief Administrative Officer