

December 6, 2010

VIA RESS AND COURIER

Ms. Kirsten Walli
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
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Dear Ms. Walli:

Re: EB-2010-0055: Union Gas Limited (Union) 2011 Incremental Low-Income Demand Side Management Plan.

Industrial Gas Users Association (IGUA) Comments.

Pursuant to Procedural Order No. 2 herein, this letter is submitted on behalf of IGUA as comment on Union's 2011 Incremental Low-Income Demand Side Management Plan (LI DSM Plan).

Union's November 3, 2010 prefiled materials include a description of the consultation process engaged in by Union in development of its LI DSM Plan. IGUA participated in that process as a Union DSM Consultative member. In so participating, IGUA; i) deferred to the sub-committee of intervenors designated to assist in preparation of the LI DSM Plan; and ii) took part directly in the broader consultative discussions that were convened to consider the sub-committee's work.

On the strength of this consultative process, and the consensus thereby achieved, subject to two points of clarification IGUA has no objection to Union's LI DSM Plan as proposed. The two points of clarification, which IGUA would appreciate confirmation on from Union in its responding submissions, are:

1. That Union's incremental LI DSM Plan budget (including any variance thereto), and the LRAM amounts and incentive payments associated with the LI DSM Plan, will be recovered through Union's R01 and M1 small volume general service rate classes¹.
2. That while Union is to *"be eligible to access an additional 15% of its incremental 2011 Low-Income DSM Plan budget, provided that it has achieved the 100% overall Home Weatherization scorecard target on a pre-audited basis"*² [emphasis added], ultimately DSMVA recovery will be subject to audited results. IGUA notes that the conditions noted

¹ November 10, 2010 LI DSM Plan document, page 9, section 2.6.

² November 10, 2010 LI DSM Plan document, page 9, section 2.6.

above regarding access to the budget variance is consistent with the 2006 DSM framework decision, and accepts the formulation on that basis.³

In considering its position on the 2011 LI DSM Plan, IGUA agrees with Union⁴ that 2011 is a transition year. IGUA is an active participant in the Board's processes towards development of the next DSM regulatory framework, and reserves all of its rights in respect of that matter.

Yours truly,



Ian A. Mondrow

cc: Murray Newton (IGUA)
Marion Redford (Union)
Crawford Smith (Torys)
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Michael Millar (OEB)
Intervenors of Record

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³ EB-2006-0021, August 25, 2006 *Decision with Reasons*, page 13.

⁴ November 10, 2010 LI DSM Plan document, page 12, 2nd last paragraph.