

December 6, 2010

VIA RESS AND COURIER

Ms. Kirsten Walli
Ontario Energy Board
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2300 Yonge Street
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Dear Ms. Walli:

Re: EB-2010-0175: Enbridge Gas Distribution Inc. (EGD) 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 EGD's 2011 Incremental Low-Income Demand Side Management Plan (LI DSM Plan).

EGD's November 11, 2010 prefiled materials include a description of the consultation process engaged in by EGD in development of its LI DSM Plan. IGUA participated in that process as an EGD 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 one point of clarification (noted below), IGUA has no objection to EGD's 2011 LI DSM Plan as proposed. The point of clarification, which IGUA would appreciate confirmation on from EGD in its responding submissions, is that EGD'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 from Rate 1 residential customers¹.

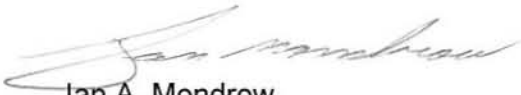
In considering its position on EGD's 2011 LI DSM Plan, IGUA agrees with the characterization in EGD's November 11, 2010 transmittal letter (top of page 2) that *"all parties consider this a one year transition to a new DSM framework"*. In particular, EGD's prefiled materials include some discussions of non-quantifiable benefits arising from low-income DSM programs, which benefits are cited in support of using a lower TRC threshold (at 0.7) for screening low-income DSM programs.² In accepting EGD's 2011 LI DSM Plan as proposed, IGUA should not be understood to be necessarily endorsing the appropriateness, for the future, of such an approach to DSM program development, implementation design or evaluation. IGUA is an active

¹ November 11, 2010 Ex. B/T2/S10, p. 5, para. 12.

² November 11, 2010 Ex. B/T2/S10, page 3, para. 8 *et seq.*

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)
Norm Ryckman (EGD)
Dennis O'Leary (Aird & Berlis)
Vince Mazzone (OEB)
Michael Millar (OEB)
Intervenors of Record

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