



October 24, 2011

**Ms. Kirsten Walli**  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
Suite 2700  
Toronto, Ontario, M4P 1E4

To: **Kirstin Walli**, Board Secretary

**Re: Union Gas's DSM Plan: *In response to the OEB's request for stakeholder engagement concerning EB-2008-0346 Demand Side Management (DSM) Guidelines for Natural Gas Utilities*<sup>1</sup>**

On behalf of Eastern Canada's Building Commissioning Association (BCA), thank you for the opportunity to provide support for Union Gas's (Union's) 2012-14 multi-year DSM plan.

The BCA's goal is: "to achieve high professional standards, while allowing for the diverse and creative approaches to building commissioning that benefit our profession and its clients."<sup>2</sup>

## **SUPPORT FOR UNION'S 2012-2014 DSM PLAN**

BCA's goal, as written above, is in line with Union's proposed 2012-14 DSM plan<sup>3</sup>. In particular BCA supports Union's incentive-based Building Optimization program.

Union's Building Optimization Program works with customers to help them identify areas for energy improvement measures in their buildings. Once these areas have been identified Union supports its customers to make operational changes and to invest in equipment that is more energy efficient. Union's DSM approach recognizes the importance of a customer and has created a paradigm that supports DSM programs that work.

BCA believes that DSM programs, like Union's, have been a major catalyst to overcoming many of the most significant barriers faced by customers trying to pursue Energy Efficiency (EE), but many barriers remain. These barriers include; lack of information (especially regarding EE best practices<sup>4</sup>); and a lack of customer assessment tools. Union's Building Optimization program addresses these issues and is driving real progress.

## **WORKING TOGETHER FOR ONTARIO'S ENERGY FUTURE**

“Green” is not a goal that is easily achieved. Making the province green will require all levels of government, utilities, consultants and customers recognizing green as a common goal, and working together to achieve it.

A prime example of the collaboration needed to achieve Ontario's green future is one between BCA and Union's team. A number of BCA's senior scientist worked with members of Enbridge and PECO to develop their DSM program with pleasing results.

## **THE FUTURE OF DSM IN ONTARIO**

BCA supports continued DSM activities and a clear and flexible approach for DSM investment that is customer focused.

The Board's decision to limit DSM budgets<sup>5</sup> is discouraging. There is a misconception that DSM programs have a long pay-back period. To make a strong stance in moving towards a “Green” Toronto, Ontario needs to be more aggressive in its energy conservation activities. In addition to increasing DSM support this effort must translate to all energy conservation programs in Ontario including Conservation and Demand Management (CDM).

For example, a typical commercial building is 25% heating and 75% electrical. The current DSM focus is on natural gas and it is important that we place a similar focus on CDM in the electricity sector.

BCA supports Union's current 2012-14 DSM plan and in specific the Commercial and Industrial programs as presented at their Consultative on August 11<sup>th</sup>, 2011<sup>3</sup>. We expect Union's Building Optimization plan to positively impact BCA's members, and Union's DSM plan as a whole to have a positive impact on making Ontario a “Green” province.

## CONCLUDING COMMENTS

We appreciate the invitation and funding that the Board has provided that allowed us the time to comment.

Ontario's natural gas industry has matured and evolved to the point where Union has understood the market and developed a proactive and measured approach that respects Ontario rate payer investments in DSM.

BCA supports expanded DSM investment and encourages the Board to consider the same in order to help Ontario continue to evolve and become more competitive.

Sincerely,



**Herb Hunter**

President

BCA, Eastern Chapter

## References

- 1) OEB, DSM Guidelines for Natural Gas Utilities, online access September 23<sup>rd</sup>, 2011: [http://www.oeb.gov.on.ca/OEB/Documents/EB-2008-0346/DSM\\_Guidelines\\_for\\_Natural\\_Gas\\_Utilities\\_20110630.pdf](http://www.oeb.gov.on.ca/OEB/Documents/EB-2008-0346/DSM_Guidelines_for_Natural_Gas_Utilities_20110630.pdf)
- 2) BCxA's main website, online access September 23<sup>rd</sup>, 2011: <https://netforum.avectra.com/eweb/StartPage.aspx?Site=BCA&WebCode=HomePage>
- 3) Union Gas's DSM multi-year presentation: **2011-08-15 UGL Consultative Meeting Aug 11.pdf**
- 4) The Canadian Energy Alliance, November 2002, The Benefits of Energy Efficiency Investment: Creating Jobs and Supporting the Economy While Addressing Climate Change.
- 5) OEB, DSM Guidelines for Natural Gas Utilities, Issues for further comment, online access September 27th, 2011: [http://www.oeb.gov.on.ca/OEB/Documents/EB-2008-0346/Brdltr\\_Issue\\_for\\_Comment\\_Gas\\_DSM\\_20110329.pdf](http://www.oeb.gov.on.ca/OEB/Documents/EB-2008-0346/Brdltr_Issue_for_Comment_Gas_DSM_20110329.pdf)

## Attended the following Consultations with Enbridge:

Meeting Agenda	Date
Enbridge/Union DSM stakeholder engagement session	July 20 <sup>th</sup> , 2011
Union's 2012-14 DSM plan meeting 1 of 2	August 11 <sup>th</sup> , 2011
Union's 2012-14 DSM plan meeting 2 of 2	August 18 <sup>th</sup> , 2011