



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

October 24, 2011

To: **Kirstin Walli**, Board Secretary

**Re: Enbridge'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 Enbridge's 2012 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 ENBRIDGE'S 2012 DSM PLAN**

BCA's goal, as written above, is in line with Enbridge's proposed 2012 DSM plan. In particular BCA supports incentive-based programs, which **Enbridge is considering for their Run It Right program.**

Enbridge's Run it Right and Energy Compass programs work with customers to help them identify areas for energy improvement measures in their buildings. Once these areas have been identified Enbridge supports its customers to make operational changes and to invest in equipment that is more energy efficient. Enbridge'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 Enbridge'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>3</sup>); and a lack of customer assessment tools. Enbridge's Energy Compass 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 interveners and Enbridge's team. This productive union resulted in the development of Enbridge's DSM programs with the input of members from many energy use sectors. This is very encouraging as it demonstrates that these collaborations work.

## **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>4</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 Enbridge's current 2012 DSM plan and in specific the Commercial and Industrial programs. We expect Enbridge's Run it Right and Energy Compass programs, to positively impact BCA's members, and Enbridge'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 Enbridge 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,

A handwritten signature in blue ink that reads "Herb Hunter".

**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) The Canadian Energy Alliance, November 2002, The Benefits of Energy Efficiency Investment: Creating Jobs and Supporting the Economy While Addressing Climate Change.
- 4) 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's DSM Stakeholder Engagement session	July 20 <sup>th</sup> , 2011
Enbridge's 1 <sup>st</sup> Market Transformation meeting	August 23 <sup>rd</sup> , 2011
Enbridge's 2 <sup>nd</sup> Market Transformation meeting	August 25 <sup>th</sup> , 2011
Enbridge's Final Market Transformation meeting	August 26 <sup>th</sup> , 2011
Enbridge's 3 <sup>rd</sup> Resources Acquisition meeting	September 7 <sup>th</sup> , 2011
Enbridge's 4 <sup>th</sup> Resources Acquisition meeting	September 9 <sup>th</sup> , 2011
Enbridge's 5 <sup>th</sup> Resources Acquisition meeting	September 13 <sup>th</sup> , 2011
Enbridge's Final Resources Acquisition meeting	September 14 <sup>th</sup> , 2011
Enbridge's Final Plenary meeting	September 21 <sup>st</sup> , 2011
Enbridge's DSM Stakeholder Engagement meeting	October 3 <sup>rd</sup> , 2011
Enbridge/Union's Final Stakeholder Engagement meeting	October 4 <sup>th</sup> , 2011