



PUBLIC INTEREST ADVOCACY CENTRE
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VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: Vulnerable Energy Consumers Coalition (VECC)
EB-2011-0327 Procedural Order # 1
Union Gas Limited DSM Plan 2012-2014

In accordance with directions in the above Procedural Order we have the following comments on behalf of VECC:

1. We have reviewed Union's response of October 21, 2011 to the Board's letter of October 28, 2011 requesting clarification of certain matters related to the Application.

We agree with Union in respect of 2012 Low Income DSM programs (Question 1) that:

To ensure program delivery and prevent market disruption, there are contractual agreements in place with suppliers, and staffing requirements focused on program delivery into 2012. More importantly, customers expect that these existing programs will continue and that they will be eligible for incentives associated with these specific programs.

Interim approval is particularly important, since Union's enhanced Low Income program only commenced in 2011 and is in the ramp-up phase.

2. We have attached a copy of the Draft Issues List with our suggested changes.

Thank you.

Yours truly,



Michael Buonaguro
Counsel for VECC
Encl.

**UNION GAS LIMITED (“UNION GAS”)
2012-2014 DEMAND SIDE MANAGEMENT PLAN, EB-2011-0327**

DRAFT ISSUES LIST: PROPOSED CHANGES FROM VECC

1.0 Budgets – Resource Acquisition Programs, Low-Income, Market Transformation, Research, Evaluation, and Administration

1.1 Are the 2012-2014 budgets for the Residential Resource Acquisition Program (2012 - \$4.103M, 2013 - \$4.282M, 2014 - \$4.054M) reasonable and appropriate and is interim approval appropriate?

1.4 Are the 2012-2014 budgets for the Low-Income program (2012 - \$6.839M, 2013 - \$6.839M, 2014 - \$6.839M) reasonable and appropriate and is interim approval appropriate?

6.0 DSM Program Screening

6.1 Is the proposed DSM Program Screening process and where applicable results, reasonable and appropriate?

8.0 Stakeholder Engagement Process

8.1 Is the proposed Joint EGD and Union Stakeholder Engagement process for Union Gas’ 2012-2014 DSM Plan reasonable and appropriate?

10.0 Research

10.1 Is the Research and Development Plan and Budgets proposed by Union Gas for 2012-2014 reasonable and appropriate?