

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, (Schedule B);

AND IN THE MATTER OF an Application by Union Gas Limited pursuant to Section 36(1) of the *Ontario Energy Board Act, 1998*, for an Order or Orders approving the 2012 to 2014 Demand Side Management Plan.

LOW INCOME ENERGY NETWORK SUBMISSION ON INTERIM APPROVAL OF PARTS OF 2012 DSM PLAN

Union Gas has requested an interim order to maintain its current 2011 programs into 2012 related to low-income and resource acquisition programs, excluding the Large Industrial Rate T1/Rate 100 Program, if the Board decision cannot be released by November 15, 2011.

The Low Income Energy Network (LIEN) offers the following submissions relating to Union Gas' Request for Interim Approval of parts of its 2012 DSM Plan:

1. LIEN would prefer that the Board decision for Interim Approval of parts of Union Gas' 2012 DSM Plan be released by November 15, 2011.
2. LIEN appreciates that the Board does not have much time to consider and deliver its decision for the Interim Approval. If the Board cannot deliver its decision by November 15, 2011, LIEN supports the continuing of Union Gas' delivery of its current 2011 low-income and resource acquisition programs into 2012.
3. LIEN submits that a stop-start in the market creates customer uncertainty and market confusion, as well as inefficiencies in program delivery. Therefore, LIEN would like to see an uninterrupted delivery of the low-income programming and a smooth transition to any new Board approved low-income programs for 2012-2014.
4. We are now in the heating season and low-income gas bills will increase as a result. Therefore, in order to give Union Gas the most opportunity to meet its DSM targets, and, in particular, to maximize its opportunity to provide DSM to low-income customers, LIEN hopes that the interim approval will not cause the approval of Union Gas' 2012-2014 DSM Plan to lose priority in the Board's regulatory agenda.

5. LIEN will cooperate fully with other intervenors and with any timelines set by the Board in this proceeding to expedite the approvals process.

November 9, 2011

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TO:

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AND TO:

ALL REGISTERED INTERVENORS

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