

09 November 2011

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: EB-2011-0327 – Union Gas 2012-2014 DSM Plan – Interim Approval

I am counsel for the Green Energy Coalition (GEC). Pursuant to Procedural Order #1 in this matter, this letter constitutes GEC's submissions on Union's request for interim approval. In preparing these submissions, GEC has had the advantage of reading the submissions of Board Staff, VECC and SEC, filed earlier today.

GEC agrees with Union, Board Staff and VECC that there is merit in ensuring the uninterrupted delivery of DSM services to customers. However, we are concerned that Union's programs, program approaches, and utility scorecard structure not be locked in. Accordingly, we agree that any approval at this time should be interim as opposed to partial. That said, we agree with SEC that Union's response to the Board's question on risk is somewhat ambiguous. GEC submits that for certainty the Board should be explicit in declaring that Union remains at risk for any revenue requirement impacts or utility incentive changes that may flow from its eventual final rate order for the interim period.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Poch', with a stylized flourish at the end.

David Poch

Cc: All parties