

September 11, 2013

BY COURIER (2 COPIES) AND EMAIL

Ms. Kirsten Walli

Board Secretary

Ontario Energy Board

P.O. Box 2319

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Toronto, Ontario M4P 1E4

BoardSec@ontarioenergyboard.ca

Dear Ms. Walli:

**Re: Environmental Defence Correspondence
EB-2012-0451 – Enbridge Gas Distribution Inc. (“Enbridge”)
GTA Pipeline Leave to Construct; EB-2012-0433, EB-2013-0074
Union Gas Ltd. (“Union”) – Parkway West and Brantford-Kirkwall
Parkway D Projects**

Enclosed please find an update to the evidence prepared by Enerlife Consulting on behalf of Environmental Defence, including a revised report and a revised version of the model (previously filed in response to Enbridge Interrogatory No. 2).

A meeting was held last week with Enbridge staff at Enerlife's offices to provide an opportunity for Enbridge staff to ask a number of questions about the Enerlife model and report. This update arises from issues raised by Enbridge in that meeting as well as Enerlife's subsequent review of its report. This update does not impact the overall conclusion in the Enerlife report that load growth can be more than offset by DSM such that overall demand is actually reduced over time.

The updates are as follows:

First, office buildings that do not use gas for water heating have been removed from the dataset of commercial buildings. These were included in the previous version due to an oversight. Seeing as the primary purpose of the dataset is to set a benchmark, it is more accurate to include only those buildings with gas water heating, which results in an “apples-to-apples” benchmarking process. Note that none of the datasets for the other sectors include buildings without gas water heating.

This change resulted in approximately a $0.5 \times 10^3 \text{ m}^3/\text{hr}$ reduction in the commercial DSM potential as set out in table 1 in the executive summary and a revision to figure 1.

Second, the formulas in cells K33 and N33 previously contained an error and were corrected.¹ This resulted in an increase in the commercial and apartment DSM potential figures. This increase more than offset the decrease resulting from the change in the office building dataset described above. The combined impact of the change in the dataset described above as well as the revision to cell formulas results in small changes to the DSM potential and avoided cost estimates in the report text, table I, and figures 2, 3 and 6.

Third, the market penetration (i.e. “ramp up”) model was updated to reflect the response to Board Staff Interrogatory No. 2. Enerlife revised its market penetration model in the process of preparing its response to Board Staff Interrogatory No. 2. The update simply reflects this revision in Enerlife’s report. The primary changes are to figures 7 to 9 and to section 4.1 from the paragraph beginning “Our proposed plan...” onwards.

Fourth, footnotes 5 and 6 were added for clarity.

Fifth, the excel file containing the complete model was updated in relation to the above issues. In addition, in the excel file, (1) the text in I34 in the “Forecast” tab was amended to “% base of total peak day demand” for clarity, (2) column M was removed from the “Savings Model” tab as that data was not used as part of the model, and (3) cells BO72-BP77 were removed from the “Forecast” tab as that data was not used as part of the model.

Again, this update does not impact the overall conclusion in the Enerlife report that all load growth in the GTA area can be completely offset through commercial and apartment DSM and that overall demand can be significantly reduced with the addition of residential and industrial DSM.

Yours truly,



Kent Elson

Encl.

cc: Applicant and Intervenors

¹ The formula in K33 was changed from “I33*W29+J33*W30” to “I33*K34+J33*(1-K34).” The formula in N33 was changed in a similar manner.