

17 April 2014

Ontario Energy Board
2300 Yonge St., 27th Floor
Toronto, ON
M4P 1E4

Attn: Ms. Rosemarie T. Leclair, Chair

By e-mail

Dear Ms. Leclair:

Re: EB-2014-0134 Consultation to develop a new DSM Framework for natural gas distributors for the period 2015 to 2020.

I write on behalf of the Green Energy Coalition in regard to the recently announced formation of a DSM Working Group. The Green Energy Coalition (GEC) represents over 125,000 Ontario residents who are members or supporters of its member organizations: the David Suzuki Foundation, Greenpeace Canada, Sierra Club of Canada and WWF-Canada.

While we appreciate that the working group must be kept to a manageable size and should have representatives from the various sectors, we were disappointed to learn that the GEC was not invited to be a member of the working group given the role that the coalition has played in the evolution of gas DSM in Ontario. In virtually every rate case and Board process touching on DSM, GEC and its experts have been a primary source of information to the Board and other parties and we have often been the lead intervenor in negotiations with the utilities. GEC's expertise on DSM matters is widely recognized by the intervenor community. Indeed, GEC's experts have been selected by the DSM consultative members to sit on each and every Audit Committee and the Technical Advisory Committee.

Given the Board's pre-emptive determination of the DSM budget issue prior to the completion of the last DSM framework consultation, we are concerned that this first stage of consultation could freeze out a fair and meaningful consideration of alternatives in subsequent phases. While as a matter of law a proposal for comment or the issuance of a Board guideline does not bind the Board, the reality is that such pronouncements often amount to a *de facto* determination. Accordingly, we ask the Board to avoid formally or impliedly endorsing any

conclusions or narrowing of options prior to non-working group members being offered the opportunity to participate and bring forward expert evidence.

Sincerely,

A handwritten signature in black ink, appearing to read "David Poch". The signature is written in a cursive style with a large, stylized "P" and "H".

David Poch