

March 4, 2015

**VIA RESS AND COURIER**

Ms. Kirsten Walli  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Ian A. Mondrow**  
Direct: 416-369-4670  
ian.mondrow@gowlings.com

Assistant: Cathy Galler  
Direct: 416-369-4570  
cathy.galler@gowlings.com

File No. T998384

**Re: EB-2014-0134: Demand Side Management Framework for Natural Gas Distributors.**

**Stakeholder Participation in Evaluation, Measurement & Verification (EM&V) Process.**

---

In the Board's *Filing Guidelines to the Demand Side Management Framework for Natural Gas Distributors (2015-2020)* issued December 22, 2014, the Board indicates that it will set out in future correspondence the specific roles and responsibilities for the parties involved in the different steps of DSM Plan evaluation, measurement and verification process. This letter is submitted on behalf of IGUA, with the intent of assisting the Board as it considers the details of that process.

To render the evaluation, measurement and verification process both robust and subject to acceptance by, and confidence on the part of, those stakeholders for whom DSM programs are designed and from whom DSM program costs are recovered, the following objectives must be realized:


1. The process must be transparent.
2. The process must be accessible to those stakeholders directly affected by its outcome, including in particular the ratepayers from whom DSM program costs (including lost revenue adjustments and shareholder incentives) are recovered.
3. Affected stakeholders must have the ability to, in a responsible manner, raise concerns and bring forward issues regarding program design and/or results.
4. The determinations made must be, and must be seen to be, independently arrived at following informed, balanced and well reasoned deliberations.

IGUA recognizes that different processes can work to the same ends. What is important is that any process adopted respect and maintain the principles enumerated above.

Concern has been expressed among DSM stakeholders that by assuming control of the evaluation, measurement and verification process the Board could disenfranchise those directly affected by, and bearing the costs of, the DSM activities. It would be helpful for the Board to squarely address these concerns when it issues the details regarding specific roles and responsibilities for DSM evaluation, measurement and verification. Those details should expressly describe when and how directly affected stakeholders will be engaged in the process, and how the Board will ensure that the objectives set out above – transparency, accessibility, participation and demonstrably informed, balanced and reasoned outcomes – will be realized.

IGUA hopes that this input is helpful to the Board's ongoing deliberations.

Yours truly,



Ian A. Mondrow

IAM

- c. Rate Regulated Natural Gas Distributors  
S. Rahbar (IGUA)  
Takis Plagiannakos (Board Staff)  
Parties Commenting on Draft Framework/Guidelines

TOR\_LAW\ 8638678\2