

March 6, 2015

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**RE: EB-2015-0029/EB-2015-0049 – DSM Multi-Year Plans – Union Gas Limited (“Union”)  
Response to Enbridge Gas Distribution (“Enbridge”) Letter**

Union has reviewed the letter filed by Enbridge on March 5, 2015. In that letter, Enbridge requests an extension of the filing date for its DSM multi-year plan to May 4, 2015.

The DSM Framework and Guidelines for Natural Gas Utilities (“Framework”) (EB-2014-0134) released on December 22, 2014 sets out the following with respect to the natural gas utilities’ applications for their 2015-2020 multi-year DSM plans:

1. The natural gas utilities shall file their multi-year DSM plans by April 1, 2015;
2. The budget and target levels will not be subject to settlement and will be subject to Board hearing;  
and
3. Union’s and Enbridge’s applications will be heard jointly.

Union intends to file its 2015-2020 DSM Plan by the April 1, 2015 deadline stipulated in the Framework. Union is concerned that a delay in filing will lead to a delay in the hearing process and ultimately a delay in implementation of its new multi-year plan. Most importantly, Union is concerned that the approach Enbridge is taking by achieving settlement with Intervenor in respect of the financial components of its 2015 DSM Plan will prejudice Union’s position in the joint application contemplated by the Board.

Accordingly, should the Board grant the leave requested by Enbridge, Union respectfully requests that the Board bifurcate the Union and Enbridge multi-year DSM plan applications. In any event, given that Union and Enbridge will have different programs with different associated budgets and targets for 2015-2020, Union sees no reason to have the applications heard together.

Yours truly,

*[original signed by]*

Vanessa Innis  
Manager, Regulatory Initiatives

c.c.: Alexander Smith, Torys  
Mark Kitchen, Union  
Stephanie Allman, Enbridge