

May 19, 2015

BY COURIER (2 COPIES) AND RESS

Ms. Kirsten Walli

Board Secretary

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Walli:

**Re: EB-2015-0049 Enbridge Gas Distribution Inc. ("Enbridge")
EB-2015-0029 Union Gas Limited ("Union")
2015-2020 Demand Side Management ("DSM") Plans**

We are writing on behalf of Environmental Defence in response to the Green Energy Coalition's requested changes to the timetable in this proceeding.

The GEC has proposed that intervenor evidence be filed after the technical conference and that an additional two weeks be provided for the filing of intervenor evidence. Environmental Defence submits that the GEC's proposed changes to the timetable would benefit the Board's review of this important application and are fair and reasonable in the circumstances.

Intervenor evidence will likely be more useful to the Board if it is provided after the technical conference as this will allow the experts to better understand the application and to write their reports in a way that accurately and directly respond to the applicants' evidence. The intervenor evidence will also likely be more concise and straightforward if the experts are provided with the time that they need.

The GEC's proposals will not unduly lengthen the proceeding. The GEC is requesting only an additional two weeks along with a reordering of the procedural steps. Furthermore, the additional time spent upfront could save valuable hearing time. Giving the experts the time they need and a better understanding of the application may avoid the need for revisions to their reports and could shorten the time needed for examination and cross-examination at the hearing.

Enbridge argues that it would be procedurally unfair for the GEC to be afforded a "second round of interrogatories." However, the GEC has not requested a second round of interrogatories. Furthermore, the GEC's proposal is clearly the more procedurally fair option. The utilities have a massive informational advantage in these proceedings.

Holding a technical conference prior to the delivery of intervenor evidence can partly address this large asymmetry of information.

In addition, the utilities have had many months to prepare their applications. They also have the full range of customer data, years of DSM plan precedents, and a roster of highly experienced staff at their fingertips. In this light, it is hard to understand how it could be procedurally unfair for intervenors to be allowed to ask utility staff people some technical questions and to have an additional two weeks following the response to those questions before filing intervenor evidence.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', with a stylized, cursive script.

Kent Elson

cc: Applicants, Intervenors, and Board Staff for this Proceeding