

October 2, 2018

VIA RESS AND COURIER

Ms. Kirsten Walli
ONTARIO ENERGY BOARD
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Dear Ms. Walli:

Re: EB-2017-0127/0128 – DSM Mid-Term Review

Industrial Gas Users Association (IGUA) Comment

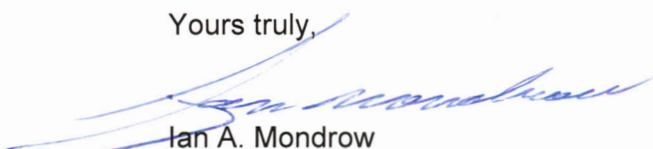
By letter dated September 18, 2018 the Board responded to a letter submitted on behalf of a number of parties to this review which letter on behalf of parties requested two rounds of submissions, in order to allow informed response to proposals expected to be pursued both by the utilities and by others. The Board declined to alter the process for submissions, stating:

Given the nature of the DSM Mid-term Review, the OEB has determined that it is not necessary to have a second round of comments.

Considering this direction, the very recent changes to the conservation and carbon regulation laws and policies in the province, and the lack of a process herein to test any proposals for material changes to the current DSM Framework, it is IGUA's understanding that the Board will not consider material changes, and it is certainly IGUA's view that the Board should not consider material changes to the current DSM Framework at this time and, absent a more rigorous process for developing, testing and obtaining input on any such proposals.

The information provided by the utilities for review has been helpful in understanding the current status of various DSM programs, concerns, and assessments. All parties are anticipating the commencement of work to develop the post-2020 DSM Framework, and IGUA looks forward to participation in that process, which would be the appropriate time to consider material changes relative to the current framework.

Yours truly,



Ian A. Mondrow

c: S. Rahbar
All Parties to EB-2017-0127/0128

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