

VIA E-MAIL

June 29, 2019

Ontario Energy Board  
Attn: Kirsten Walli, Board Secretary  
P.O. Box 2319  
27<sup>th</sup> Floor, 2300 Yonge Street  
Toronto ON M4P 1E4

**RE: EB-2019-0003 – POST 2020 Natural Gas DSM Framework – FRPO Submission**

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (“FRPO”) in regard to the Board’s consultation on Post-2020 DSM. While we want to be responsive to the Board’s questions, we also want to ensure limit our responses to matters where we may be of assistance to the Board at this stage to the proceeding.

**Fundamental Question is How Do DSM Best Serve the Public Interest**

In making our submissions later than others, we have had the benefit of seeing the range of responses and we will not take inappropriate advantage of that. However, in reviewing the broadly diverse submissions and the changes since the last framework was developed, we believe that the Board should conclude that it is time for a fundamental rethink of how the DSM programs could serve the public interest.

We respectfully submit that the goals of DSM ought to be re-considered through consultation to ensure alignment with current government policy and intended outcomes sought. From there guiding principles can be reviewed, revised or developed that flow from the revised goals.

**SEC’s Submissions Should Have Weight**

While we won’t use the advantage of the timing of our submissions to counter any points made by others, we do want to note that we requested and received an advance draft of the submissions of the School Energy Coalition (“SEC”). In our view, SEC has served Ontario well in its contribution to the development, assessment and periodically litigation of DSM plans for a couple of decades. We requested an advanced copy of their submissions as their comments in the stakeholder session aligned with one of our long standing concerns and that is the payment of huge incentives on what can be defined as educated guesses of the public interest benefit.

We have reviewed SEC’s submission and support their well-reasoned and analytical approach calling for a fundamental re-think. We adopt their submissions that it is time for DSM plan incentives to be tied to the determination of actual energy saving as opposed to forecasts. Ostensibly, Ontario is supposed to be better off with the DSM

programs in place for over two decades. But, as the Board will see from many submissions, the actual benefits are debatable.

A One Year Extension is Reasonable

As submitted by others, we would support a one year extension of the current framework to allow time for a consultation on an evolved regulatory framework for DSM. Investing an additional year in seeking enduring benefits from a review seems like a reasonable investment for Ontario given that we should all be focused on the long term benefits.

EGD's Approach to LI for Privately-Owned Multi-unit Residential Should be Expanded

While FRPO submits that it is time for a fundamental re-think of DSM, we would respectfully submit that some aspects of the evolution ought to be maintained. Until the last few years, Low-income tenants in privately-owned multi-unit residential buildings were denied the benefits of LI DSM afforded to those in social housing. However, just before the outset of the new framework, Enbridge Gas Distribution worked with intervenor groups, including and specifically Low-income representatives to develop geo-targeting of privately-owned low-income multi-unit residential buildings. Then Enbridge took it a step further and spear-headed a working group that include the City of Toronto, United Way, Toronto Hydro and FRPO to investigate how to implement the geo-targeting while creating engagement with low-income customers to provide a wholistic approach to energy savings that benefitted many. At the same time, the legacy Union company lagged in their approaches to include these opportunities. However, their most recent published audit report provides hope that they are recognizing the attractiveness of a market that has been under-serviced.

During what we would recommend is a one-year extension of the current framework, the combined utility Enbridge Gas Inc. has opportunity to demonstrate its ability to export what it has learned in the broader legacy EGD franchise and the legacy Union Gas territory to broaden the impact of its original work. While we still promote incentives tied to measured benefits, we believe that what has been learned about outreach should not be abandoned as this approach could prove effective in whatever a new framework may bring.

Respectfully Submitted on Behalf of FRPO,



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Principal  
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- c. Interested Parties EB-2019-0003  
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