

December 9, 2019

**VIA RESS AND COURIER**

Ms. Christine E. Long  
Registrar & Board Secretary  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Ian A. Mondrow  
Direct 416-369-4670  
ian.mondrow@gowlingwlg.com

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

T1021007

Dear Ms. Long:

**Re: EB-2019-0271: Enbridge Gas Inc. (EG) 2021 DSM Plan Application**

**Industrial Gas Users Association (IGUA) Comment on EG Proposal**

---

As counsel to IGUA we are in receipt of EG's November 27<sup>th</sup> letter to the Board applying for approval of a Demand Side Management (DSM) plan for the period January 2021 through December 2021. EG has proposed that the Board proceed without a hearing to extend the Board's current DSM Framework, and EG's current DSM plan thereunder, for a year, pending determination by the Board of a DSM framework to replace the current framework.

IGUA does not oppose EG's request, with the caveat that the Board should expressly retain its discretion to provide supplementary direction to EG regarding transition of its DSM programs between the current DSM framework and the replacement framework to be developed, considering all of the circumstances at the time of any such supplementary direction.

IGUA sympathizes with EG's concerns as expressed in its November 27<sup>th</sup> letter regarding adequate lead time to effect DSM program changes for 2021, and expressed in the context of the pending process announced by the Board to undertake a comprehensive review of the current DSM framework for the purposes of establishing a new framework for the future.<sup>1</sup> At the same time, December 2021 is two years away, and it may not be appropriate to simply continue the "status quo" in respect of DSM programming that long. While IGUA acknowledges that EG will need reasonable lead time to transition its existing program to a program appropriate for a new DSM framework, the amount of lead time reasonably required will depend on what that new framework is. Transition requirements and timing therefore are matters most appropriately determined in the context of the

---

<sup>1</sup> EB-2019-0003 Post-2020 Natural Gas Demand Side Management Framework; September 16, 2019 letter to parties.

comprehensive review to be undertaken, and it would be premature to determine 2 years in advance to defer any aspect of such transition until after December 2021.

Accordingly, if the Board is inclined to approve EG's application as filed, and without a hearing, IGUA submits that it should make that approval an interim one, and expressly subject to future determinations by the Board regarding appropriate transition between the current DSM framework and the replacement framework under development.

Yours truly,

  
Ian A. Mondrow

c:     A. Stiers (EGI)  
       D. O'Leary (Aird & Berlis LLP)  
       S. Rahbar (IGUA)

TOR\_LAW\ 10144947\1