

Ms. Christine Long
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

December 11, 2019

Re: EB-2019-0271 Enbridge 2021 DSM Plan

Dear Ms. Long:

Pollution Probe is in receipt of the Enbridge filing for the above noted proceeding. Pollution Probe also had an opportunity to review the December 9th correspondence filed by Mr. Elson on behalf of Environmental Defence and proceeding with a DSM extension without a hearing does not appear to align with current provincial policy, the Minister's Directives to the Board, or represent the best interest of consumers (includes gas and electricity consumers due to program interactions at the consumer level). It also appears that the proposed status quo extension does not consider the 2019 Integrated Ontario Electricity and Natural Gas Achievable Potential Study which identified that significantly more cost-effective DSM/CDM results available than currently pursued. Some of this could occur directly from synergies between the Union Gas and Enbridge program portfolios.

Pollution Probe acknowledges Enbridge's concern that there is just over a year left before their current OEB DSM funding approval concludes and that funding certainty in advance of 2021 is beneficial for program continuity and consumers. It is standard practice for a review of a DSM plan prior to approval of Ratepayer funding and this can easily be accommodated prior to 2021 through a transparent process. During the review of the proposed 2021 plan it would be beneficial to consider targeted enhancements that would address the most significant issues identified (e.g. budget, target, scorecard, enhanced partnerships, etc.). Failing to consider those elements during the review would delay opportunities to meet key policy objectives and provide greater benefits to consumers.

Pollution Probe hereby applies for intervenor status and requests that it be eligible for the recovery of reasonably incurred costs for its participation. Pollution Probe is a frequent intervenor in Board proceedings and a copy of the current Annual Filing can be found on the Board's website at the following location:

<http://www.rds.oeb.ca/HPECMWebDrawer/Record/647508/File/document>

Pollution Probe intends to focus on the issues identified above, program enhancements given current information and partnerships that will enable Ratepayer funds to be leveraged in a more cost-effective manner. Pollution Probe believes that review of the proposed 2021 DSM Plan would also require a conditional approval of a one-year Framework extension (likely as part of EB-2019-0003).

Notice

Pollution Probe requests that further communications with respect to this matter be sent to:

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Respectfully submitted on behalf of Pollution Probe.

Original signed by

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cc: Adam Stiers, Enbridge (email via EGIRegulatoryProceedings@enbridge.com)
Dennis O'Leary, Aird & Berlis (via email)
Richard Carlson, Pollution Probe (via email)