

Sent by Email

December 17, 2019

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Board File No. EB-2019-0271
Enbridge Gas Inc.'s 2021 Demand Side Management Plan**

Willms & Shier Environmental Lawyers LLP is counsel for the Ontario Sustainable Energy Association ("OSEA").

OSEA is in receipt of Enbridge Gas Inc.'s ("Enbridge") application for the above noted proceeding dated November 27, 2019. OSEA has reviewed Environmental Defence's response letter to the Board dated December 9, 2019. OSEA supports Environmental Defence's position and request for a hearing to determine how Enbridge's 2021 Demand Side Management Plan can be made compliant with government policies and directives.

OSEA also seeks intervenor status and cost eligibility in this matter.

ABOUT OSEA

OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute to energy conservation and sustainable energy development for Ontario. OSEA aims to ensure funding and rates that encourage conservation, energy efficiency and the incorporation of renewable energy.

OSEA's members, both individuals and organizations, are interested in the development of sustainable energy and conservation in Ontario as consumers, individuals and citizens of Ontario. OSEA has been an intervenor and awarded costs by the Board in numerous previous hearings, and the Board recognized that OSEA can provide "an important and unique perspective" in EB 2011-0118.

OSEA actively participates and contributes in Board proceedings and intends to provide meaningful comments on Enbridge's 2021 Demand Side Management Plan.

COST ELIGIBILITY

In accordance with section 3.03 of the Board's *Practice Direction on Cost Awards*, OSEA believes that it is eligible for an award of costs because it:

- a) primarily represents the direct interests of consumers in relation to services that are regulated by the Board, and
- b) primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding about Enbridge's 2021 DSM Plan.

OSEA can continue to provide an important and unique perspective in the current consultation initiative. OSEA does not have the funds of its own to allocate towards its meaningful participation in this matter.

OSEA'S REPRESENTATION OF CONSUMERS

In accordance with criterion 3.03(a) from the *Practice Direction*, OSEA primarily represents the direct interests of consumers (eg. ratepayers) in relation to regulated services. OSEA's membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA's members include green technology developers, distributors, installers and operators and other service providers. OSEA thereby represents the direct interests of consumers.

OSEA serves as an advocate, network and capacity builder for individuals, manufacturers, installers, builders, developers, municipalities, First Nations, unions, farmers, co-operatives, NGO's, associations and other organizations supportive of, and engaged in, the full portfolio of sustainability energy solutions. OSEA also aims to provide education about all types of renewable energy technologies.

OSEA is a public interest organization that advocates for energy efficiency, renewable energy and innovation leading to a more sustainable energy economy. OSEA is not an association for energy generators. OSEA's membership is diverse, and includes small scale distributors and service providers of renewables, and very few large generators. OSEA's mandate includes assisting consumers and their communities to receive the best value for their energy dollars whether through conservation, efficiency, generation, or otherwise. OSEA is not a trade or industry association representing any specific product suppliers, generators, or specific generation technologies.

OSEA'S POLICY PERSPECTIVE RELATIVE TO THE BOARD'S MANDATE AND THIS PROCEEDING

The Board's mandate is articulated in the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), s. 2, and includes promoting energy conservation and energy efficiency in accordance with the policies of the Government of Ontario.

In accordance with criterion 3.03(b) from the *Practice Direction*, OSEA primarily represents a public interest relevant to the Board's mandate and to this proceeding. As previously stated, OSEA represents the public interest and advocates for methodologies and system planning to achieve energy conservation and energy efficiencies.

OSEA has contributed fully to the development of DSM policy in Ontario for many years. OSEA was invited to participate on the Advisory Committee for the DSM Guidelines. OSEA also intervened in Union Gas Limited and Enbridge Gas Distribution Inc.'s applications for the 2015-2020 DSM Framework (EB-2015-0029 and EB-2015-0049), and the Board's mid-term review of the 2015-2020 DSM plans (EB-2017-0127 and EB-2017-0128). OSEA provided comments in the Board's most recent consultation for the Post 2020 DSM Framework (EB-2019-0003) on topics such as:

- ♦ advocating for the introduction of Performance-Based Conservation in the next generation DSM framework,
- ♦ supporting that both DSM province wide programs and geographically targeted DSM programs should be considered in the context of infrastructure planning to inform system planning and provide expertise for DSM implementation, and
- ♦ advocating that natural gas plus DSM should be considered in energy infrastructure planning at the regional and local levels.

REPRESENTATIVES

OSEA's counsel and consultant in this matter are:

Joanna Vince/Victoria Chai

jvince@willmsshier.com /

vchai@willmsshier.com

Willms & Shier Environmental Lawyers LLP

1 Toronto Street, Suite 900

Toronto, ON M5C 2V6

T: 416-862-4830/4843

F: 416-863-1938

Marion Fraser, Consultant

marion.fraser@rogers.com

Fraser & Company

1005 - 65 Harbour Square

Toronto, ON M5J 2L4

416-941-9729

Yours truly,



Victoria Chai