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June 12, 2020

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

Dear Ms. Long,

**RE: EB-2019-0271 - Enbridge Gas Inc. Application for DSM Extension to 2021 – Argument of
London Property Management Association**

Please find attached the argument of the London Property Management Association in the above noted proceeding.

Yours very truly,

Randy Aiken

Randy Aiken
Aiken & Associates

c.c. EGI Regulatory Proceedings (e-mail only)

Enbridge Gas Inc.

**Application to extend approved 2020 Demand Side
Management Plan for one-year into 2021**

**SUBMISSIONS
OF
LONDON PROPERTY MANAGEMENT ASSOCIATION**

A. INTRODUCTION

Enbridge Gas Inc. (“EGI”) filed an application with the Ontario Energy Board (“Board”) on November 27, 2019 seeking approval for an extension of its current 2015-2020 Demand Side Management (“DSM”) Framework for one year, effective January 1, 2020 to December 31, 2021. In addition, EGI requested that the Board issue an Order extending its previously approved 2020 DSM Plans for one year into 2021 and that the Board approve the proposed 2021 DSM Plans as filed.

Parties filed interrogatories on or before March 16, 2020 and EGI provided responses on April 6, 2020, with updates to a few interrogatories filed on May 25, 2020 and June 2, 2020.

EGI filed its Argument-in-Chief (“AIC”) on May 25, 2020.

The following are the submissions of the London Property Management Association (“LPMA”).

B. SUBMISSIONS

LPMA’s submissions in this hearing have been guided by the Board’s findings, as found in Procedural Order No. 1 dated February 24, 2020. In particular, the Board stated:

“The OEB announced that it is undertaking a comprehensive review of the DSM policy framework in a letter dated September 16, 2019. As a result, the OEB does not expect material changes to the programs and no increase to the overall DSM budget to take place during the transition period from the current OEB-approved

DSM plans. In light of the on-going policy consultation, parties are expected to focus their participation during this proceeding on ensuring that the OEB's previously-approved 2020 DSM plans will continue to deliver cost-effective savings in 2021, consistent with the OEB's January 20, 2016 Decision and Order and DSM Mid-Term Report. The OEB expects that submissions from parties should be directed to the best alignment of Enbridge Gas resources and effort available within the existing plan in order to maximize results."

LPMA submits that EGI has appropriately complied with the expectations of the Board as there are no material changes to the programs for 2021 as compared to 2020 and there is no increase to the overall DSM budget in 2021 relative to 2020 (Exhibit I.LPMA.2b). In addition to no increase in the overall DSM budget, the maximum shareholder incentive for 2021 relative to 2020 (Exhibit I.LPMA.2c).

As noted in the Board's findings noted above, parties were expected to provide submissions directed to the best alignment of EGI resources and effort available within the existing plan in order to maximize results. As shown in Attachment 1 to Exhibit I.SEC.2, the 2021 proposed budget is identical to the 2020 Board approved budget by program, program overheads and portfolio overheads.

LPMA submits that there is no basis to depart from the same alignment of EGI resources and effort in the proposed plan for 2021 in order to maximize results, given that is identical to the Board approved plan for 2020.

However, LPMA also notes that the current COVID-19 emergency is likely to materially impact on EGI's resources and efforts and impact its results for 2020. This may dictate a realignment of 2021 programs to focus on programs that were not delivered as expected in 2020 or because some programs may be easier to deliver than others during the COVID-19 emergency. LPMA expects that EGI will make adjustments in order to maximize results in 2021 that reflect the realities of 2020.

C. COSTS

LPMA requests that it be awarded 100% of its reasonably incurred costs.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

June 12, 2020

Randy Aiken

Consultant to London Property Management Association