

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

June 12, 2020

**Re: EB-2019-0271 Enbridge 2021 DSM Plan  
Pollution Probe Submission**

Dear Ms. Long:

Please find enclosed Pollution Probe's Submission on the above noted proceeding.

Respectfully submitted on behalf of Pollution Probe.



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Dennis O'Leary, Aird & Berlis (via email)  
Interest Parties (via email)  
Richard Carlson, Pollution Probe (via email)

**ONTARIO ENERGY BOARD**

**Enbridge 2021 DSM Plan**

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**POLLUTION PROBE SUBMISSION**

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**June 12, 2020**

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## Background

Enbridge applied to the Ontario Energy Board (“OEB” or “Board”) November 27, 2019 for a one-year extension of the current DSM Framework. The requested extension is effectively a roll-forward of the Enbridge 2020 DSM Plan including all programs, scorecards and other parameters (i.e., budgets, targets, and performance incentive structure). The total budget approval requested by Enbridge (combined legacy Enbridge Gas and Union Gas) for 2021 is \$132,106,971.

The OEB issued Procedural Order No. 1 on February 24, 2020 and Pollution Probe was granted Intervenor status in the proceeding. Procedural Order No. 1 also reconfirmed that the OEB is undertaking a comprehensive review of the DSM policy framework and 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.

OEB Staff and intervenors submitted Interrogatories to Enbridge Gas prior to the March 16, 2020 deadline. Enbridge Gas filed final Interrogatory materials on May 25, 2020 and also filed its Argument in Chief on May 25, 2020, requesting that the OEB truncate the process to enable an earlier decision. On June 1, 2020, the OEB issued Procedural Order No. 4 which moved up the deadline for Intervenor submissions to June 12, 2020. Updates to Interrogatory responses were subsequently filed by Enbridge on June 2, 2020 and Enbridge filed a relevant Progress Report on June 9, 2020 related to its DSM improvement efforts as required by the Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015-2020) (EB-2017-0127/0128).

This following is the written submission from Pollution Probe in relation to this proceeding.

## Context

On September 6, 2019, Enbridge Gas submitted a letter to the OEB and Parties to the Post 2020 Natural Gas Demand Side Management Framework Consultation proceeding (EB-2019-0003) noting concern that the status and progress related to the Post 2020 Framework was not on pace to achieve completion prior to 2021<sup>1</sup>. On November 27, 2019 Enbridge filed an expedited 18-page application requesting OEB approval for \$132,106,971<sup>2</sup> (combined amount for Enbridge Gas Distribution and Union Gas rate zones) and a roll-over of 2020 programs and metrics to 2021. The OEB has provided a process to validate and enhance the value that Ratepayers will receive based on the proposed DSM investment in 2021. This will be a particularly critical year since there will be a backlog of demand for DSM due to 2020 COVID -19 restrictions and an increased opportunity to partner with various levels of government on increased programs and funding as part of the recovery effort. DSM is one of the most effective tools to support the current economic recovery and provides more than double the economic benefits for every dollar spent.

Pollution Probe anticipates that the new DSM Framework will enable greater flexibility and spending to realize DSM benefits for Ontario consumers, but even under the current Framework (in alignment with the scope defined by the OEB for this proceeding) there are portfolio efficiencies, low hanging fruit and significant opportunity to increase the value for consumers, support the economic recovery and advance the policy objectives in the Province of Ontario (e.g. Ontario's Environment Plan and municipal energy plans). Low hanging fruit comes in many forms including more effective and comprehensive partnering (e.g. IESO, FCM, municipalities and other levels of government), consolidating programs, reducing overhead costs, etc. Essentially all programs should be developed and run on a partnership model<sup>3</sup>. Combining program delivery with organizations dealing with the exact same consumers increases program effectiveness and reduces administrative and overhead costs. Program and budget efficiencies also exist due to the merging of Enbridge and Union Gas portfolios and programs. Enbridge has unlocked some of this value and more is available.

In fact, there is more need in 2021 than ever to ensure that DSM value is unlocked for Ontario consumers. The Province has put in place several policy initiatives to reduce consumer bills and related emissions including investing approximately \$130 million to expand natural gas infrastructure and Ontario's Environment Plan<sup>4</sup> which specifically highlights the importance of incremental DSM results. There are also policies and

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<sup>1</sup> EB-2019-0003, Correspondence, September 6, 2019

<sup>2</sup> Note: this was the sum we calculated, but notice that Enbridge AIC indicates \$132,106,917.

<sup>3</sup> <https://www.oeb.ca/sites/default/files/OC-378-2019%20signed.pdf>

<sup>4</sup> <https://www.ontario.ca/page/made-in-ontario-environment-plan>

programs at all levels of government that highlight the importance for significantly increasing the level of energy efficiency funding and activity. To be responsive to consumer demands and industry changes the OEB has also initiated several proceedings to remove barriers and enhance local distributed energy resources, which includes energy efficiency as part of the solution. Municipalities are mandated to create energy conservation plans (under O. Reg. 397/11) and many have also created community energy and emission plans targeting lower use of natural gas. If DSM programs were better aligned to take advantage of all these opportunities, Ontario consumers would receive significantly more benefits. Changes are required to unlock this value and opportunity.

Natural gas system expansion is in fact increasing under current Provincial policy as supported by the Board. The driver for this initiative is to provide low cost energy to communities in Ontario. System expansion provides one of the best and most cost-effective ways to achieve DSM results in Ontario<sup>5</sup>. Ontario needs to leverage this opportunity in 2021 and recommendations are included in this submission to support that objective.

The 2021 DSM program year is an unusual situation where the current Framework is struggling to meet the needs of Ontario consumers and evolving policy objectives, yet it is necessary to leverage that Framework until a new Framework can be put in place. Fortunately, there is opportunity in 2021 to leverage flexibility under the current Framework to bridge the gap in this important transitional year. For purposes of this submission Pollution Probe has used the following principles to guide its assessment, comments and recommendations. The 2021 DSM portfolio must:

- Maximize flexibility and opportunities available under the current DSM Framework
- Use 2021 effectively as a transitional year to achieve greater results for Ontario consumers and clean up legacy issues under the current Framework
- Drive program and overhead efficiencies in alignment with the Mid-Term Review of the Demand Side Management (DSM) Framework<sup>6</sup>

In its proposed 2021 DSM Plan Enbridge largely aligns with the rules under the current Framework. Pollution Probe is proposing a similar approach where all the guidelines under the current Framework remain in place for 2021 and flexibility under the current Framework be applied to achieve greater results. Pollution Probe is also proposing that all potential program and portfolio efficiencies supported under the current Framework

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<sup>5</sup> EB-2019-0187 Exhibit I. Pollution Probe.1

<sup>6</sup> EB-2017-0127/0128, Report of the Ontario Energy Board, Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015- 2020), November 29, 2018.

be put in place for 2021 since it is meant to be a bridge to the next generation DSM Framework. None of these recommendations require changes to the current DSM Framework in 2021, or material changes to programs previously approved by the OEB. They simply take advantage of opportunities now to increase value to Ontarians prior to the next generation DSM Framework.

In its Argument-in-Chief, Enbridge highlights numerous important reasons why it is in the best interest of all ratepayers that DSM program offerings continue on a seamless basis throughout the transition period leading to the new DSM Framework once adopted by the Board<sup>7</sup>. Pollution Probe agrees with the points Enbridge identified in support of continuous long-term DSM programming.

Enbridge has expressed its interest in an OEB Decision as soon as possible to enable program continuity and that work on the new Framework moved forward quickly so that 2022 is not impacted. This concern was reinforced by other parties that submitted letters to the OEB and is supported by Pollution Probe. Pollution Probe believes that program continuity is important to ensure long term DSM success and more importantly that 2021 sets a suitable foundation for increased future success. It is unfortunate that stakeholders and consumers are worried about DSM continuity, likely due to the lag in moving forward with the next generation Framework. It is evident to Pollution Probe that the Board supports long term DSM programs and funding in Ontario, consistent with EBO 188, its Directive to pursue all cost-effective DSM<sup>8</sup>, plus consumer and policy demands. There should be no questions that funding for 2021 and beyond will be available and Pollution Probe recommends that the Board remove any fears that Enbridge, BOMA, LIEN, HSC, consumers or any other stakeholders may have about long term funding and sustainability of DSM. Any doubts restrict effective planning and the benefits available to Ontario consumers now and in the long term.

### Regulatory Drivers and Partnerships

Pollution Probe believes that it is useful to consider the policy context for 2021, even if the DSM budget constraints under the current DSM Framework budget does not enable full realization of those policy outcomes. Policy drivers including DSM Directive for the OEB and Ontario's Environment Plan promote achieving all costs effective DSM. This is further supported by the OEB/IESO 2019 Achievable Potential Study and the plans across Ontario for municipalities to reduce energy and emissions. Other supporting Provincial regulation mandates energy and emissions reporting and reduction plans for municipalities, hospitals, schools, universities & colleges, large building owners and

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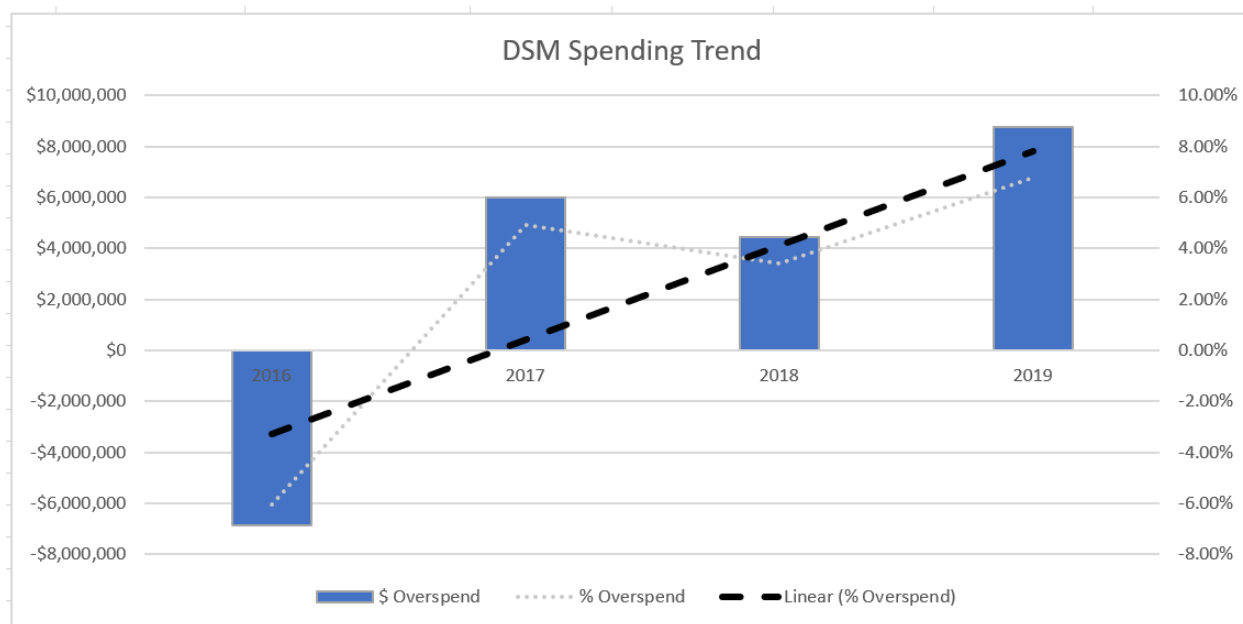
<sup>7</sup> EB-2019-0271 Argument in Chief of Enbridge Gas Inc. Page 6.

<sup>8</sup> [https://www.oeb.ca/oeb/Documents/Documents/Directive\\_to\\_the\\_OEB\\_20140326\\_CDM.pdf](https://www.oeb.ca/oeb/Documents/Documents/Directive_to_the_OEB_20140326_CDM.pdf). Section 4.

other sectors in Ontario<sup>9</sup>. Municipalities across Ontario are looking to the OEB to support them in their need for cost-effective options to reduce energy and emissions. In November 2019 Ontario also celebrated the one year anniversary of the Environment Plan and Ministry Yurek reiterated that the "Made-in-Ontario Environment Plan is our roadmap to providing effective and affordable solutions to address climate change and protect our environment". 2021 will be an important year to ensure that all program and portfolio efficiencies are harvested under the current DSM Framework. Many of those opportunities are highlighted in this submission.

### Budget Efficiencies & Issues

Enbridge has shown that even with the existing programs there still are cost-effective DSM opportunity that exceed the Enbridge DSM budget<sup>10</sup>. By increased program partnering, leveraging funding opportunities and maximising efficiencies Enbridge can deliver more results in 2021. The chart below shows the amount of DSM spending above budget by the utilities (combined totals) for all completed years of the current Framework<sup>11</sup>. This show the demand for more DSM results and will only increase in 2021 for the reasons outline above.



2020 DSM result will likely be impacted by COVID-19 restrictions that are forecasted by the Province to be in place until late summer 2020 and recent announcements from the

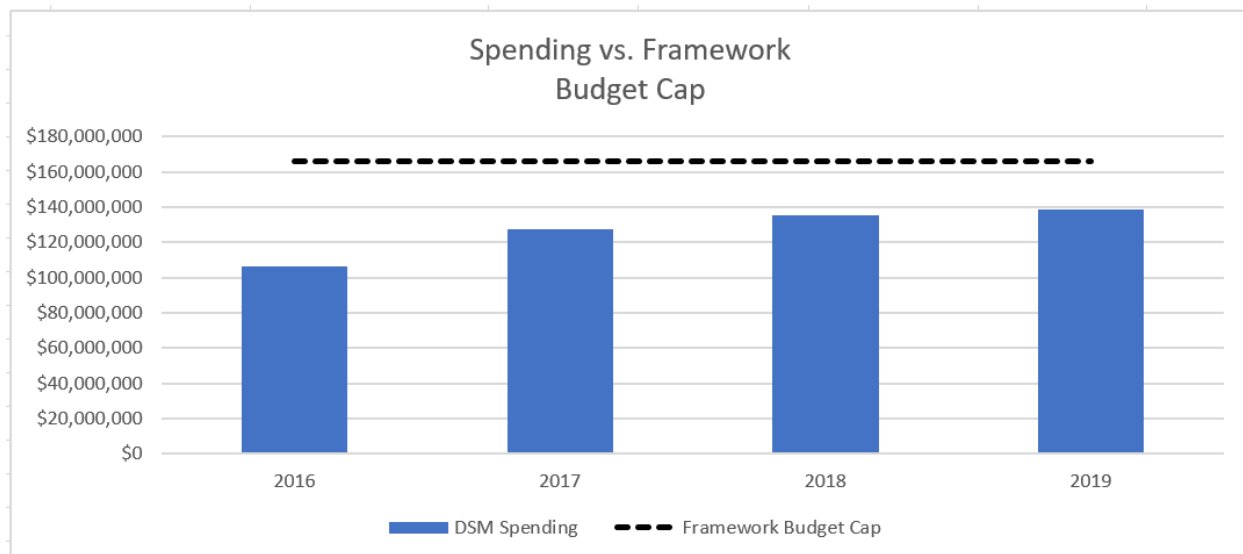
<sup>9</sup> Ontario Regulations 397/11 and 20/17

<sup>10</sup> EB-2019-0271 Exhibit I.ED.10

<sup>11</sup> Data from EB-2019-0271 Exhibit I.PP.1

Province indicate that restriction will be lifted in advance of 2021. The backlog in DSM activity will cause 2021 DSM program demand to be higher than typical under the current DSM Framework and if sufficient budget room and operating efficiencies are not in place for 2021, it will result in DSM maxing out the allowable budget part way through the year. Program continuity is essential for ongoing success and limiting or cancelling programs part way through 2021 will cause lasting effects beyond 2021. The DSMVA has been accessed regularly over the current Framework and is meant to be a safety net so that Ontario consumers do not get stranded with no access to DSM programs during a program year. Program budgets are stretched and even the DSMVA will be too restrictive to meet consumer demand in 2021. Pollution Probe recommends that the OEB consider providing access to the full budget amount under the current Framework (i.e. \$166 million or \$34 million more than Enbridge's proposed budget) should program funding be at risk of running out in 2021 causing program cancellations at a badly needed time for Ontarians. Energy efficiency employs almost half a million people in Canada<sup>12</sup> with a large portion in Ontario and pulling the plug part way through 2021 will have a disastrous effect. If the OEB is not comfortable providing this flexible at this point, it could be done during 2021 in an expedited manner.

The following chart<sup>13</sup> shows spending (including DSMVA) for all completed years over the current DSM Framework compared to the \$2 per customer budget cap. For the reasons mentioned above, 2021 is expected to have greater demand for DSM programs and even with the DSMVA Enbridge is going to have to increase portfolio efficiency and partnering to meet DSM demand within the current budget.



A direct rollover of 2020 budgets does not align with usual budget increases under the current Framework and as shown above there is additional room for the OEB to leverage under the current Framework to meet the needs of Ontarians in 2021.

<sup>12</sup> <https://www.eco.ca/research/report/energy-efficiency-canada/>

<sup>13</sup> Data from EB-2019-0271 Exhibit I.PP.1 and Exhibit I.ED.7



Enbridge indicated that a simple roll-over of the 2020 budget would “allow for the full resources of Enbridge Gas and stakeholders to focus on the development of the next DSM framework”. Aside from a short Stakeholder update session in February 2020, there has been no recent advancement of the next generation Framework. Based on Enbridge’s evidence and rationale it will be necessary to have the new Framework and related plans reviewed and approved mid-way through 2021 which provides less than a year to complete the new Framework and develop the 2022 DSM Plan. That timing sounds correct to Pollution Probe. Under that scenario, there will be a large portion of 2021 where the new DSM Framework and related program plans are known and approved but Enbridge will be playing under the old rules. Enbridge acknowledged that the Board may provide supplementary direction on transitional elements<sup>14</sup> and it may be appropriate to allow for a mid-year check-in to see if additional flexibility is needed in 2021 to act as a bridge to the new DSM Framework and meet the expected demand in the future.

### Program Efficiencies

In its Mid-Term Report, the Board communicated that it “expects that as the merger between Enbridge Gas and Union Gas proceeds, the utilities will strive for cohesion and begin planning for a combined DSM plan in the post-2020 term”<sup>15</sup>. The Board Report has been in place for more than a program year and it is reasonable to expect those efficiencies to be in place for 2021. A more structured approach is required to ensure that all program and portfolio efficiencies are leveraged. Pollution Probe has included a recommendation to conduct a detailed inventory and assessment of DSM portfolio efficiencies (cost, results, partnerships and other efficiencies or net benefits) achieved with the combined DSM portfolio to 2021. This will help ensure that by the end of 2021 these efficiency opportunities have been completed (or resolved) and that Enbridge can more effectively focus on new programs to support 2022 and beyond.

Enbridge indicates that it “does not forecast participants/results at the program or offering level, but rather at the scorecard metric level”<sup>16</sup>. Managing and forecasting only at a high level is not best practice and obviously not a sufficient manner to validate that Ratepayer funds are spent efficiently. The program efficiencies that the OEB has requested based on the Mid-Term Review<sup>17</sup> can only be achieved through a detailed analysis and monitoring at the program level. That also aligns with best practices for program portfolio management.

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<sup>14</sup> EB-2019-0271 Exhibit I.IGUA.1 Page 2 of 2.

<sup>15</sup> EB-2017-0127 / EB-2017-0128, Report of the Ontario Energy Board Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015-2020) (November 29, 2018), p. 32.

<sup>16</sup> EB-2019-0271 Exhibit I.CCC.3

<sup>17</sup> EB-2017-0127/0128, Report of the Ontario Energy Board, Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015- 2020), November 29, 2018, p. 13.

### Targeted Opportunities for System Expansion

As noted previously, natural gas distribution expansion continues in 2021 and is in fact increasing under current Provincial policy as supported by the Board. The primary driver for this initiative is to provide low cost energy to communities in Ontario. System expansion provides one of the best and most cost-effective ways to achieve DSM results in Ontario<sup>18</sup>. Enbridge has acknowledged untapped opportunity to achieve cost-effective DSM results while expanding the natural gas system to new communities and customers<sup>19</sup>. Although Enbridge acknowledges the benefits of its DSM programs to reduce costs to new customers, it does not include DSM educational information early in its community outreach or survey materials. Attachments rates for recent expansion projects are less than 50% (a poor utilisation rate for Ratepayer funded investments) and providing DSM information could increase uptake on fuel switching from dirtier fuels. This is a lost opportunity to provide valuable information and programs at a critical decision point for consumers. Hopefully these silos will be broken down as part of the IRP proceeding. Enbridge has provided programs to consumers prior to them becoming a customer (e.g. new commercial building design) and these opportunities can be better leveraged as consumers make choices on contractors and equipment. Municipalities also have requirements to report energy and emission annually to the Province and develop plans for energy efficiency<sup>20</sup>. There is an opportunity for Enbridge to also coordinate with those municipalities to increase DSM support and incentives<sup>21</sup>.

The system expansion planning and implementation process at Enbridge does not currently leverage DSM effectively during this critical time of fuel switching, renovation and equipment replacement for homes and businesses. Changes are required to extract this value in 2021 and beyond. In alignment with the Board's mandate to achieve all cost-effective energy efficiency, Enbridge has undertaken some activities to close these gaps and more is required. Pollution Probe recommends that the Board require a targeted DSM plan for all new system expansion projects starting in 2021.

### Integration of DSM

As outlined above, utility planning, operations and metrics are siloed and this is a barrier to achieving the full range of DSM benefits that consumers pay for and deserve. This siloed regulatory approach has affected a variety of applications and is illustrated by Enbridge's response that "the issues of DSM integration with Integrated Resource Planning ("IRP"), Asset Management, Carbon Strategy and Gas Supply Planning exceed the scope of Enbridge Gas's 2021 DSM Plans"<sup>22</sup>. Enbridge is struggling with effective integration and requires assistance from the OEB to put these synergies in place to drive greater results. To be completely fair, most utilities struggle with these integration challenges. In the case of IRP, Enbridge made it clear that it requires "policy

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<sup>18</sup> EB-2019-0187 Exhibit I. Pollution Probe.1

<sup>19</sup> EB-2019-0187 Exhibit I. Pollution Probe.1

<sup>20</sup> Ontario Regulation 397/11

<sup>21</sup> EB-2019-0188 Exhibit I.PP.15

<sup>22</sup> EB-2019-0271 Exhibit I.OSEA.1. Page 4

direction”<sup>23</sup> in order to effectively plan and implement more integrated supply side and demand side activities. DSM plans need to acknowledge those challenges and greater direction and expectations from the OEB would assist in breaking down those silos and achieving the DSM efficiencies prior to the next generation DSM Framework. A broader assessment and policy direction may be part of future DSM and IRP proceedings. However, benefits do not need to be delayed and Pollution Probe has provided some “quick win” recommendations that fall within the scope of the current Framework and are easily applicable to the 2021 DSM Plan.

### Evaluation Improvement Opportunities

There have been several improvements recommended through the evaluation process<sup>24</sup>. Enbridge responded to the need for improved DSM tracking and reporting systems by upgrading the systems in 2018 and 2019. Enbridge also indicated that it did not know how to prioritise evaluation recommendations it has received. During 2021 (prior to the new Framework) it would make sense to review all outstanding audit and evaluation recommendations and develop a comprehensive list that can be prioritised (or irrelevant issues deleted). This could be done through the Evaluation Advisory Committee (EAC) process on an open and transparent basis with input opportunity from all stakeholders. It appears that something is broken with the current EAC process and changes should be considered to bring more transparency to that process. This was characterised by GEC’s comment that “GEC was not alerted to the availability of the 2017 and 2018 verification reports before Enbridge’s reference in its reply submission of April 24th”<sup>25</sup>. Pollution Probe was also not aware of any notification made to stakeholders that those reports were complete and posted to the OEB Website March 13, 2020. The EAC process is meant to be more transparent and inclusive than it currently is and changes are needed.

It is also surprising to hear that the data related to the 2019 Achievable Potential Study (APS) data is just starting to be assessed now for opportunities to improve programs for 2021. The APS has been available in its final form since Fall 2019 and Pollution Probe understands that Enbridge and members of the EAC were also involved in the review process for its creation. Moving forward with a 2021 DSM Plan without optimising the DSM portfolio based on the APS is suboptimal.

Enbridge indicates that it “will use the study as part of the efforts to maximize results under the current 2015-2020 DSM Framework which Enbridge Gas is incented to do by the OEB-approved scorecards and metrics. Enbridge Gas believes the “2019 APS represents just one input of many that should be considered in support of generating DSM forecasts and for the purposes of informing measure prioritization”<sup>26</sup>. Perhaps Enbridge could receive stakeholder feedback and input to optimise those program

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<sup>23</sup> EB-2019-0159 Exhibit A Tab 13 Page 1

<sup>24</sup> EB-2019-0271 Exhibit I.STAFF.5

<sup>25</sup> EB-2019-0271 GEC Motion - Reply Submission dated April 24, 2020

<sup>26</sup> EB-2019-0271 Exhibit I.ED.5 (f)

results in 2021 through the re-establishment of the Consultative. Pollution Probe recommends a thorough assessment and gap analysis of program enhancements based on the 2019 Achievable Potential Study (APS). Although the program adjustments will likely come into effect in 2022, the work would need to be conducted in 2021 to support the next generation DSM Framework. Some quick wins may be available for Enbridge to apply during 2021.

### DSM Consultation in 2021

Enbridge suggests that the 2021 DSM Plan did not require stakeholder consultation since it is an extension of its OEB approved 2020 plan<sup>27</sup>. The plan requires OEB review and approval, which in itself provided an opportunity for review and input by stakeholders. In Pollution Probe's view it is always more beneficial if stakeholder consultation occurs during the development of a plan rather than after it is filed for approval. This also provides opportunities to enhance program efficiencies, identify strategic opportunities (e.g. funding matching) and build program partnerships that are more cost-effective and accessible for Ontario consumers. It appears that there may be some confusion restricting consultation since the OEB took over audit and evaluation for DSM. Pollution Probe recommends that the OEB remove that confusion and reinforce the need and value of regular and ongoing input and consultation.

Enbridge indicated that it "is not averse to incremental stakeholder engagement in 2021, provided that the Board signals that such engagement is appropriate"<sup>28</sup>. To this point, Pollution Probe is suggesting that the OEB support Enbridge to re-establish a DSM Consultative in 2021 to provide better and more regular opportunities for stakeholder input. Some stakeholders may be in a better position to provide real-time DSM improvement and partnership opportunities and the Consultative could be structured to ensure that the right stakeholders are present for each session (e.g. program innovation and partnership vs. regulatory issues).

### Recommendation Summary for 2021

Based on the information provided above, Pollution Probe has the following specific recommendations for 2021.

1. OEB approval of a 2021 DSM portfolio with efficiencies outlined in this submission as soon as practical, but certainly prior to September 30, 2020 to enable continuity of programs for 2021.
2. Include a 2021 mid-year check-point to see if additional flexibility is needed in 2021 or access to the remainder of funding room under the current Framework (i.e. \$166 million or \$34 million more than Enbridge's proposed budget).
3. For all DSM programs that have already been harmonised by Enbridge Gas and Union Gas, provide the ability to treat these on a portfolio basis (i.e. combine the

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<sup>27</sup> EB-2019-0271 Exhibit I.PP.3

<sup>28</sup> EB-2019-0271 Exhibit I.PP.9 (b)

budgets and scorecard targets for Enbridge Gas and Union Gas to enable flexibility to serve customer demand across Ontario (rather than artificial barriers by geography).

4. Require a detailed inventory and assessment of DSM portfolio efficiencies (cost, results, partnerships and other efficiencies or net benefits) achieved by Enbridge's combined DSM portfolio to 2021. In alignment with the OEB's Mid-Term Review of the Demand Side Management Framework, cost efficiencies must include overheads and administration, including marketing and promotion costs, especially considering the merger of Enbridge Gas and Union Gas. The report would be provided no later than June 1, 2022 and could be reviewed as a component of the 2021 Evaluation Report. Alternatively, the OEB could commission an independent consultant to conduct this assessment earlier.
5. Require a targeted DSM plan for all new system expansion projects to maximise DSM results.
6. A review of the OEB Evaluation and Audit Committee (EAC) and related processes in 2021 to assess opportunities for improvement and better transparency. The review should be open to all stakeholders.
7. Review all outstanding audit and evaluation recommendations and develop a comprehensive list that can be prioritised and implemented in 2021.
8. A thorough assessment and gap analysis in 2021 of program enhancements based on the 2019 Achievable Potential Study (APS). Although the program adjustments will likely come into effect in 2022, the work would need to be conducted in 2021 to support the next generation DSM Framework. Some quick wins may be available for Enbridge to apply during 2021.
9. Re-establishment of the DSM Consultative to provide opportunities for better consultation and continuous improvement at regular intervals on an annual basis. The Consultative could be structured to ensure that the right stakeholders are present for each session (e.g. program innovation and partnership vs. regulatory issues).
10. As proposed by Enbridge<sup>29</sup>, proceed with the next generation DSM Framework development immediately and lay out a schedule that enables Framework improvements to be completed in time for application to the 2022 DSM Plan.

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<sup>29</sup> EB-2019-0271 Argument in Chief of Enbridge Gas Inc. Page 3.