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**Our File No. 339583-269**

June 12, 2020

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Christine Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. (“EGI”)  
EGI 2021 Natural Gas DSM Plans  
Board File No. EB-2019-0271**

We are counsel to Canadian Manufacturers and Exporters (“CME”). Please consider this letter to be CME’s submission pursuant to Procedural Order #4 in the above-noted proceedings.

On November 27, 2019, EGI applied to the Board for an extension of the current 2015-2020 DSM framework into 2021. EGI based this request on the fact that there was insufficient time before the implementation of a 2021 DSM program for the Board and stakeholders to create a new, multi-year framework.<sup>1</sup>

On February 24, 2020, the Board determined in Procedural Order #1 that it did not expect any material changes to EGI’s DSM programs for 2021, or any increases to EGI’s DSM budget. The Board informed parties to focus their participation on ensuring that the previous 2020 DSM continued to deliver cost-effective savings in 2021.

With respect to the limited issue of continued cost-effective savings outlined by the Board in Procedural Order #1, CME believes that EGI’s proposed extension of the 2020 DSM plan is reasonable and appropriate. Given that the 2020 DSM plan was approved by the Board and delivered value to Ontarians, and based on the evidence provided that demonstrates EGI has not sought to alter its budget or the allocation of resources, CME submits that EGI’s current proposal will continue to deliver cost-effective savings in 2021.

CME also believes that extending the current 2015-2020 DSM framework into 2021 is appropriate as the result of the onset of COVID-19. While CME acknowledges that COVID-19 could have

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<sup>1</sup> Ontario Energy Board, EB-2019-2071, Application.

dramatic impacts on the delivery and results of many of EGI's DSM programs, CME is concerned that alterations to EGI's current DSM program, introduced contemporaneously with COVID-19 could compound uncertainty on top of uncertainty. In CME's view, the continuation of the current DSM program will allow EGI to identify the impacts of COVID-19 on their DSM offerings, and make alterations for the program going forward.

Yours very truly



Scott Pollock

- c. Adam Stiers & Stephanie Allman (EGI)  
Dennis M. O'Leary (Aird & Berlis LLP)  
Intervenors in EB-2019-0271  
Alex Greco (CME)