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July 6, 2020

VIA RESS

Ms. Christine E. Long
Registrar and Board Secretary
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, Ontario
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Dear Ms. Long:

Re: EB-2019-0271 – Enbridge Gas Inc. (EGI) 2021 DSM Plan Application.

Industrial Gas Users Association (IGUA) Additional Comment.

We write in respect of EGI's Reply Argument comments on APPrO's submission seeking exemption from DSM programming and DSM program funding obligations for natural gas fired generators (GFGs). In submitting this letter we note, as has EGI, that no evidence was filed and no interrogatories were posed on APPrO's proposal[1] and as such no comment could be made on it in our argument submission earlier filed.

IGUA's large volume gas consumer members, who take service mostly under EGI's Rate T2 or Rate 100 (as do APPrO's GHG members), sympathize with APPrO's arguments in favour of exempting from DSM funding obligations gas consumers already subject to several layers of GHG related regulations and associated costs. Indeed IGUA has argued for that in the past. However, in light of the scope of this proceeding as directed by the Board in Procedural Order No. 1 and reaffirmed in the Board's ruling on GEC's IRR motion, IGUA has assumed that considerations regarding inclusion and exclusion of LVCs from DSM programming would be a matter for review during the development of the post-2021 DSM framework.

EGI is correct in its suggestion that *"those members of the T2 and T100 rate classes that would be affected by this change would want an opportunity to respond to [APPrO's] proposed change"*[2], and in noting, as noted above, that no evidence was filed and no interrogatories were posed on APPrO's proposal and so there is no information save for EGI's Reply Argument comments upon which to assess the consequences to other customers of the proposal. EGI's Reply Argument comments

[1] EGI Reply Submission, paragraph 59.
[2] EGI Reply Submission, paragraph 58.

assume no downward adjustment in DSM large volume customer (LVC) DSM budgets in the event of exemption of certain LVCs.

If the Board is to consider APPrO's proposal, it must also consider a concomitant reduction to EGI's DSM budget for large volume customers so that remaining T2 and Rate 100 customers are not reallocated costs previously borne by GFGs. The Board should require such information prior to finalizing any orders that would result in changes to the current DSM cost recovery from T2 and Rate 100 rate classes in 2021.

Yours truly,

Ian Mondrow

c: A. Stiers (EGI)
D. O'Leary (Aird & Berlis LLP)
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Intervenors of Record

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