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Ms. Christine Long
Board Secretary and Registrar
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Long,

**RE: EB-2020-0067 – Enbridge Gas Inc. 217/2018 DSM Deferral and Variance
Account Disposition Application-Submissions on behalf of OGVG**

These are the submissions on behalf of OGVG with respect to the above noted proceeding. OGVG was added as an intervenor after the interrogatory process was completed and accepted the record as it then stood in order to avoid prolonging the application process.

Having reviewed the application and interrogatory responses, and subject to any issues raised by other interested parties,¹ OGVG's only concern with respect to the proposed clearances relates to the disposition of approved balances through "a one-time billing adjustment for in-franchise contract and ex-franchise customers in the Union rate zones".²

OGVG is concerned that the size of the one-time billing adjustment may adversely impact the cash flow for at least some customers; this concern, which exists any time EGI seeks to recover large amounts from its customers using one-time adjustments rather than over time, is exacerbated in this proceeding as a result of the clearance of 2 years' worth of account balances rather than a single year. By way of illustration, EGI calculates that an M4 customer at the high end of the consumption range for the M4 class will experience a one-time adjustment of \$56,016.³ That same customer with the same

¹ By way of example, OGVG is aware that Board Staff has proposed a disallowance of \$.54M with respect to the Enbridge Zone balances related to cost overruns in the Enbridge Zone DSM Tracking and Reporting Zone System project; OGVG's silence on this issue should not be construed as an implicit submission to the effect that there is no issue.

² Exhibit I.STAFF.1

³ Exhibit C Tab 3 Schedule 2 Appendix A 2 Page 1 of 1

consumption will have experienced a one-time adjustment as a result of the clearance of 2016 DSM related accounts of \$28,788, approximately $\frac{1}{2}$ the adjustment that EGI is proposing in this application as a result of the clearance of 2 years at the same time.⁴

While EGI asserts that a one-time adjustment remains appropriate, OGVG notes that in the 2016 DSM proceeding (EB-2018-0300) EGI confirmed on behalf of the Union Rate Zone that in-franchise contract class customers have the option of arranging alternative payment arrangements:

In-franchise contract class customers' one-time adjustment invoice is payable when the invoice is due and late payment charges will apply for unpaid amounts. Customers may contact their Account Manager to request alternative payment arrangements, for a maximum period of 6 months. These requests will be considered depending on the customers unique circumstances on a case by case basis.⁵

While OGVG would respectfully suggest that it would be appropriate to consider recovery of DSM amounts over time for all rate classes in order to avoid any undue rate impacts on customers as a result of one-time adjustments, OGVG expects that the alternative payment arrangements available to contract customers as set out by EGI in the 2016 DSM proceeding can help avoid unduly impacting those customers for whom the requested disposition is a hardship.

Accordingly, OGVG would ask through this submission that EGI confirm that the alternative payment arrangements option as described above continue to be available to customers that request it, and that EGI makes that option known to its contract customers in the normal course.

All of which is respectfully submitted this 28th day of October, 2020.

Yours very truly,



Michael R. Buonaguro

⁴ EB-2018-0300 Exhibit A Tab 4 Appendix B Schedule 2 Page 2 of 2 establishes the M4 unit rate of .2399 cents per m³, compared to the unit rate of .4668 cents per m³ claimed in this proceeding for the same rate class; at Exhibit C Tab 3 Schedule 2 Appendix A 2 Page 1 of 1 EGI establishes a volume of 12,000,000 m³ for the largest user in the M4 rate class in order to illustrate bill impacts.

⁵ EB-2018-0300 Exhibit C.OGVG.Union.1 part b)