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May 31, 2021

VIA E-MAIL

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

Dear Ms. Long:

**Re: EB-2021-0072 Enbridge Gas Inc. 2019 Demand Side Management (DSM) Deferral and  
Variance Account Disposition Application  
Final Submissions of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the final submissions of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

*(Original Signed By)*

John Lawford, Counsel for VECC

Copy to: Enbridge Gas Inc.

**EB-2021-0072**

**Enbridge Gas Inc.**

**Application for 2019 Demand Side Management Deferral  
and Variance Account Disposition**

**VECC Submissions May 31, 2021**

Enbridge Gas Inc. (Enbridge Gas) filed an application with the Ontario Energy Board (OEB) on March 10, 2021 under section 36 of the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, (Schedule B) seeking approval to clear amounts recorded in certain 2019 deferral and variance accounts related to its delivery of natural gas conservation and energy efficiency programs.

The accounts which are the subject of this Application and the balances recorded (excluding interest) are as follows in Tables 1 and 2.<sup>1</sup>

**Table 1**  
**2019 DSM Deferral and Variance Account Balances - EGD Rate Zone**

<b>Account (\$ millions)</b>	<b>2019</b>
DSM Incentive Deferral Account	\$6.717
DSM Variance Account	\$6.422
LRAM Variance Account	\$0.009
<b>Total Balance</b>	<b>\$13.148</b>

**Table 2**  
**2019 DSM Deferral and Variance Account Balances - Union Rate Zones<sup>2</sup>**

<b>Account (\$ millions)</b>	<b>2019</b>
DSM Incentive Deferral Account	\$5.950
DSM Variance Account	\$2.336
LRAM Variance Account	\$0.928
<b>Total Balance</b>	<b>\$9.214</b>

Enbridge Gas proposes that disposition of these deferral and variance account balances be implemented in alignment with other rate changes through the Quarterly Rate Adjustment Mechanism (QRAM), effective as soon as October 1, 2021.

For a typical residential customer in the EGD rate zone with annual consumption of 2,400 m3, the estimated one-time billing adjustment charge is \$7.40. For a typical residential customer in the Union South rate zone with annual consumption of 2,200 m3, the estimated one-time billing adjustment charge is \$7.99. For a typical residential customer in the Union North rate zone with annual

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<sup>1</sup> Exhibit A Tab 3 Schedule 1 Page 5

consumption of 2,200 m3, the estimated one-time billing adjustment charge is \$0.80.<sup>2</sup> Enbridge Gas estimates that approximately 15% of Residential customers are Low-Income customers.<sup>3</sup>

VECC has reviewed the evidence in this proceeding and supports Enbridge Gas's request to clear the amounts recorded in 2019 deferral and variance accounts related to delivery of natural gas conservation and energy efficiency programs.

All of which is respectfully submitted.

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<sup>2</sup> Exhibit C Tab 3 Schedule 1 Page 1

<sup>3</sup> VECC IR#1