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June 2, 2021

Christine E. Long
Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto ON
M4P 1E4

Dear Ms. Long,

**RE: EB-2021-0002 EGI 2022-2026 DSM Program
Energy Probe Intervenor and Cost Eligibility Request Letter**

Energy Probe Research Foundation (Energy Probe) hereby applies for intervenor status and cost eligibility in EB-2020-0002, the application by Enbridge Gas Inc to the Ontario Energy Board for the approval its 2022 to 2026 Demand Side Management Framework and Plan..

Statement of Interest

Energy Probe is a non-profit environmental and consumer organization which promotes economic efficiency in the use of resources. It will be representing its many individual residential customer supporters. Energy Probe argues for equitable rates that optimize results for all ratepayers by eliminating cross subsidies between ratepayer classes and between generations of ratepayers. It promotes sustainable resource use through individual responsibility and accountability. More information about Energy Probe can be found on the OEB website. <https://www.oeb.ca/industry/applications-oeb/intervenor-information/annual-filings-frequent-intervenors>

The interest of Energy Probe in this proceeding is the impact on ratepayers, including its supporters, of the OEB approvals requested by EGI, including the multi-year DSM Budgets totalling \$916 Million. In addition, Energy Probe will focus on the proposed Residential Sector Programs,

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Incentives and Cost Effectiveness Tests and examine these in detail in the context of the overall DSM program and budgets.

Energy Probe also notes at Exhibit E Tab1 Schedule 2 Paragraphs 8 and 9 of the Evidence, the now announced Federal Government (May 27, 2021) new Greener Homes Canada Program as well as a CMHC Retrofit Loan Program. These Programs will provide competition for qualified Energy Auditors and will require coordination with the corresponding proposed EGI Programs. This will require time and amendments to Residential DSM Budgets.

Form of Hearing

EGI has requested a curtailed hearing with separation of Budget and Program approvals with interim approval of the former by August 31, 2021. Energy Probe disagrees with that request.

Apart from the need to coordinate EGI Residential Programs with the Federal Government, it is not appropriate to proceed as EGI has proposed, without allowing ratepayers fair procedural process. The OEB should reject the proposed process to separate the approval of \$916 million multi-year budget and proceed as normal with a full review of how the money is to be spent.

In order to maintain continuity of DSM Offerings in 2022, the 2021 Budget and rates should remain in place until the 2022-2027 DSM Framework and Programs have been approved.

Costs

Energy Probe is a non-profit organization which relies on individual donations to help protect the public interest. Without the prospect of an award of costs, Energy Probe's ability to participate in proceedings would be very limited. Energy Probe intends to seek a cost award in this proceeding, and expects to intervene responsibly, cognizant of the Board's guidelines regarding cost awards.

Communications

Communications relating to this Intervenor and Cost Eligibility Request Letter and all documents filed with the Board by the applicant and required by Energy Probe, should be directed to its consultant:

Roger Higgin SPA Inc. 15 Malabar Place Don Mills, Toronto Ontario M3B 1A4 416-391-0738 spainc@rogers.com
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Respectfully submitted on behalf of Energy Probe,

Roger Higgin PhD., MBA., P. Eng..
SPA Inc. Consultant representing Energy Probe.

cc. Patricia Adams (Energy Probe Research Foundation)
Tom Ladanyi TL Energy Regulatory Consultants Inc.
EGI Regulatory Affairs
D. O'Leary Aird and Berlis -Counsel to EGI

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