

Sent by Email

June 10, 2021

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, ON M4P 1E4

Attention: Christine Long, Registrar

Dear Ms. Long:

**Re: Board File No. EB-2021-0002**  
**Enbridge Multi-Year Natural Gas Demand Side Management Plan (2022 to 2027)**

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Willms & Shier Environmental Lawyers LLP is counsel for the Ontario Sustainable Energy Association (“OSEA”).

OSEA is in receipt of Enbridge Gas Inc.’s application for the above-noted proceeding.

OSEA seeks intervenor status and cost eligibility in this matter.

### **ABOUT OSEA**

OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute to energy conservation and sustainable energy development for Ontario. OSEA aims to ensure funding and rates that encourage conservation, energy efficiency and the incorporation of renewable energy.

OSEA’s members, both individuals and organizations, are interested in the development of sustainable energy and conservation in Ontario as consumers, individuals and citizens of Ontario. OSEA has been an intervenor and awarded costs by the Board in numerous previous hearings, and the Board recognized that OSEA can provide “an important and unique perspective” in EB 2011-0118.

OSEA actively participates and contributes in Board proceedings and intends to provide meaningful comments on Enbridge’s Multi-Year Natural Gas Demand Side Management Plan.

## **COST ELIGIBILITY**

In accordance with section 3.03 of the Board's *Practice Direction on Cost Awards*, OSEA believes that it is eligible for an award of costs because it:

- a) primarily represents the direct interests of consumers in relation to services that are regulated by the Board, and
- b) primarily represents an interest or policy perspective relevant to the Board's mandate and to this proceeding about Enbridge's Multi-Year Natural Gas Demand Side Management Plan.

OSEA can continue to provide an important and unique perspective in the current proceeding. OSEA does not have the funds of its own to allocate towards its meaningful participation in this matter.

## **OSEA'S REPRESENTATION OF CONSUMERS**

In accordance with criterion 3.03(a) from the *Practice Direction*, OSEA primarily represents the direct interests of consumers (eg. ratepayers) in relation to regulated services. OSEA's membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA's members include green technology developers, distributors, installers and operators and other service providers. OSEA thereby represents the direct interests of consumers.

OSEA serves as an advocate, network and capacity builder for individuals, manufacturers, installers, builders, developers, municipalities, First Nations, unions, farmers, co-operatives, NGO's, associations and other organizations supportive of, and engaged in, the full portfolio of sustainability energy solutions. OSEA also aims to provide education about all types of renewable energy technologies.

OSEA is a public interest organization that advocates for energy efficiency, renewable energy and innovation leading to a more sustainable low carbon energy economy. OSEA is not an association for energy generators. OSEA's membership is diverse and includes small scale distributors and service providers of renewables, and very few large generators. OSEA's mandate includes assisting consumers and their communities to receive the best value for their energy dollars whether through conservation, energy efficiency, renewable energy generation, or by lowering their greenhouse gas emissions. OSEA is not a trade or industry association representing any specific product suppliers, generators, or specific generation technologies and in fact, is technology agnostic.

## **OSEA'S POLICY PERSPECTIVE RELATIVE TO THE BOARD'S MANDATE AND THIS PROCEEDING**

The Board's mandate is articulated in the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), s. 2, and includes promoting energy conservation and energy efficiency in accordance with the policies of the Government of Ontario.

In accordance with criterion 3.03(b) from the *Practice Direction*, OSEA primarily represents a public interest relevant to the Board's mandate and to this proceeding. As previously stated, OSEA represents the public interest and advocates for methodologies and system planning to achieve energy conservation, renewable energy, and energy efficiencies.

OSEA's mandate on energy conservation and sustainable energy relates directly to Enbridge's Multi-Year Natural Gas Demand Side Management Plan. OSEA interests in this proceeding include understanding:

- ◆ Enbridge's proposed long-term GHG reduction target, and GHG reduction incentive
- ◆ Enbridge's proposed Low Carbon Transition Program, and heat pump program offerings
- ◆ the interaction between Enbridge's proposed DSM Framework and the IRP Framework, and
- ◆ linkages between the DSM programs and electricity Conservation Demand Management ("CDM") framework, and opportunities for DSM-CDM collaboration.

OSEA has contributed fully to the development of DSM policy in Ontario for many years. OSEA was invited to participate on the Advisory Committee for the DSM Guidelines. OSEA also intervened in Union Gas Limited and Enbridge Gas Distribution Inc.'s applications for the 2015-2020 DSM Framework (EB-2015-0029 and EB-2015-0049), and the Board's mid-term review of the 2015-2020 DSM plans (EB-2017-0127 and EB-2017-0128). OSEA provided comments in the Board's consultation for the Post 2020 DSM Framework (EB-2019-0003) on topics such as:

- ◆ advocating for the introduction of Performance-Based Conservation in the next generation DSM framework,
- ◆ supporting that both DSM province wide programs and geographically targeted DSM programs should be considered in the context of infrastructure planning to inform system planning and provide expertise for DSM implementation, and
- ◆ advocating that natural gas plus DSM should be considered in energy infrastructure planning at the regional and local levels.

OSEA also participated in the most recent proceeding about Enbridge's 2021 DSM Plan (EB-2019-0271), as well as the proceeding in Enbridge's proposed Integrated Resource Planning Framework (EB-2020-0291).

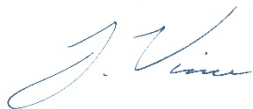
**REPRESENTATIVES**

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Yours truly,



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by the Law Society of Ontario*

cc: Dan Goldberger, OSEA

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