

June 10, 2021

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

Dear Ms Long:

Re: EB-2021-0002 – Enbridge Gas Inc. – Demand Side Management Plan 2022-2027

I am a consultant to the Consumers Council of Canada (“Council”). I have been instructed by my client to intervene in the proceeding to consider the Application to the Ontario Energy Board (“OEB”) by Enbridge Gas Inc. (EGI”) for approval of its Demand Side Management (“DSM”) Framework and DSM Plan for the period 2022-2027. The Council is a public-interest entity which represents the interests of residential consumers in Ontario. The Board’s order in this proceeding will ultimately impact the bills that residential consumers pay for natural gas and the program offerings for those customers.

On March 15, 2020, the Council filed with the Board, pursuant to Rule 22.03 of the Ontario Energy Board’s Rules of Practice and Procedure, a document describing the Council, its mandate and objectives, membership, the constituency represented, and the types of activities the Council carries out. In addition, we provided a list of the individuals authorized to represent the Council in OEB proceedings.

The nature and scope of the Council’s intended participation in the proceeding will include the following issues:

1. EGI’s proposed DSM budgets, targets and programs;
2. Incentive mechanisms;
3. Methodologies for evaluation;
4. The allocation of DSM costs among the various customer classes;
5. Rate impacts arising from the proposals;
6. The interaction of EGI’s proposals with government programs including the new Canada Greener Homes Grant program;
7. The interaction of EGI’s proposals with electricity conservation and demand management;
8. Other aspects of the Application that may impact residential consumers.

The Council intends to participate in the various aspects of the proceeding which may include an interrogatory process, a technical conference, a settlement conference and a hearing. The Council is of the view that it is premature at this point for the OEB to determine if this Application should be dealt with through an oral or written hearing process. That determination should be made following the initial interrogatory process.

The Council intends to ask for an order of costs in this proceeding. The Council has participated in many natural gas proceedings over a long period of time and most of EGI’s previous DSM proceedings. In all of those proceedings the Council has been recognized as being eligible for an award of costs. In the absence of an award of costs the Council would be unable to participate in this proceeding.

Copies of all correspondence related to this proceeding be sent to the following:

Julie Girvan
Consultant
62 Hillside Avenue East
Toronto, ON
M4S 1T5
jgirvan@uniserve.com

Please let us know if any further information from the Council is required at this time.

Yours truly,

Julie E. Girvan

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CC: EGI, Regulatory Affairs
Ken Whitehurst, Consumers Council of Canada