

July 6, 2021

VIA RESS

Ms. Christine E. Long
Registrar
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Dear Ms. Long:

Re: EB-2021-0002 – Enbridge Gas Inc. (EGI) 2022-2027 DSM Plan Application.

Industrial Gas Users Association (IGUA) Submissions on Interim 2022 Program Approval Request.

In its Application herein EGI seeks¹;

“... approval from the OEB pursuant to an interim decision no later than August 31, 2021 approving the Company’s proposed DSM activities in 2022 subject to necessary adjustments on a prospective basis following the OEB issuing its final Decision and Order in this proceeding.”

In conjunction with this request, EGI also seeks²;

“... early approval from the OEB on a stand alone final basis of the budget proposed for 2022 as the “base budget envelope” for the 6 year DSM Plan and the escalation methodology which has been proposed...”

Under EGI’s proposed approvals sequence, what would be left for subsequent “final” approval, it appears, would be program details within the already approved base budget envelope and escalation methodology and for implementation following the OEB’s final order herein.

The OEB has determined that EGI’s request for early budget approval is premature, given the interrelationship between budget and program considerations.³ Since EGI sought both 2022 program approval and budget certainty, it is not clear what the impact of budget uncertainty is on EGI’s

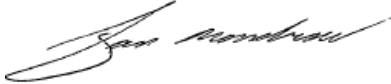
¹ ExA/T2/S1/p3/paragraph 10.

² ExA/T2/S1/p3/paragraph 11.

³ Procedural Order No. 2.

proposed 2022 programming. Provided, however, that the risk of budget and related (e.g. incentive mechanism) uncertainty in the interim is borne by EGI, IGUA takes no objection to an interim approval allowing EGI to engage in its proposed 2022 DSM programming for large volume customers like IGUA's members, pending the OEB's final decision in this matter.

Yours truly,



Ian A. Mondrow

c: A. Patel (EGI)
 D. O'Leary (Aird & Berlis LLP)
 J. Wasyluk (OEB Staff)
 S. Rahbar (IGUA)
 Intervenors of Record