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July 6, 2021

Ms. Christine Long  
Registrar  
Ontario Energy Board  
P.O. Box 2319  
26<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON  
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Long,

**RE: EB-2021-0002 Enbridge Gas Inc. 2022-2027 DSM Plan**

These are the submissions on behalf of the Ontario Greenhouse Vegetable Growers (OGVG) with respect to Enbridge Gas Inc.'s (EGI's) request for interim approval of its 2022 DSM Program year.

OGVG notes that the OEB has highlighted the intended goal of the proposed interim approval to be as follows:

- a) to ensure program continuity, and
- b) to limit market disruption and confusion amongst potential participants and vendors.<sup>1</sup>

In this context OGVG has no objection to the proposal that while the OEB processes EGI's application for a 2022 to 2027 framework for its DSM related activity EGI should have interim approval to continue providing DSM programming to its customers.

OGVG recognizes that, ultimately, the issue of interim approval should only affect a period of several months within the context of a proposed 6-year framework; accordingly, OGVG does not expect that the OEB, EGI or the parties will want to dwell too heavily on the specifics of interim approval leading into and during the first several months of 2022. To that end OGVG believes that the parameters of the interim approval should be as simple as possible.

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<sup>1</sup> Procedural Order #1, page 2.

### *Resource Acquisition Programs*

In OGVG's submission, interim approval should only be extended to permit EGI to continue to engage with its customers and vendors to provide DSM service to its customers, specifically in the realm of Resource Acquisition Programs. In OGVG's view, it is not necessary to provide interim approval of the framework components like, for example, the form of any shareholder incentive mechanism or related savings targets. OGVG respectfully submits that to the extent that EGI's activities in delivering DSM programming to customers during the interim period are in some fashion incompatible with the framework that is ultimately approved, the OEB can provide directions to account for the transitional nature of the 2022 DSM year as part of its decision on the application as a whole rather than try to formulate those directions as part of the interim approval.

Having said that, it does not appear to OGVG that there will be insurmountable issues of incompatibility between the activities undertaken by EGI during any interim period and the activities that EGI will be permitted to undertake during the remainder of the proposed 6-year period in the context of Resource Acquisition Programs. For the commercial sector within which OGVG's members operate, it appears from the evidence that the Resource Acquisition Programs proposed by EGI are, for the most part, a continuation of the programs that EGI has employed in the past. Specifically, it appears to OGVG that the proposed Prescriptive Downstream, Commercial Custom, and Direct Install offerings are continuations of existing programs, presumably with some proposed changes in how they are delivered in an attempt to increase their effectiveness. The only ostensibly "new" offering appears to be the proposed "Prescriptive Midstream" program, although even that apparently new offering is based on encouraging the adoption of the same suite of technologies that underpin the Prescriptive Downstream and Direct Install programs.<sup>2</sup> Accordingly, while it may be that the framework proposed by EGI and the framework ultimately approved by the OEB may differ significantly, it does not appear to OGVG that there is a substantial risk that the actual suite of DSM programs that EGI obtains from vendors and provides to consumers within its proposed Resource Acquisition Programs will be materially different under each framework.

### *Market Transformation Programs*

OGVG was provided a draft of the submissions on interim relief on behalf of Environmental Defence (ED), and notes specifically the concerns raised by ED with respect to EGI's proposed new Market Transformation Programs. OGVG respectfully supports ED's conclusion that it would be inappropriate to provide interim approval of the proposed new Market Transformation Programs, and that those programs should only proceed, if at all, after the OEB has fully reviewed the proposals and provided any

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<sup>2</sup> Exhibit E, Tab 4, Schedule 1, pages 10-15. This is OGVG's first impression of the nature of these programs based on the evidence as filed, prior to the interrogatory phase.

necessary changes to the scope of the proposed programs and the manner in which they should be delivered.

Yours very truly,

A handwritten signature in blue ink, appearing to read 'M. Buonaguro', is positioned above the printed name.

Michael R. Buonaguro