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July 7, 2021

Christine Long  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. (“EGI”)  
Application for Multi-Year Natural Gas Demand Side Management Plan (2022 to 2027)  
Board File #: EB-2021-0002**

We are counsel to Canadian Manufacturers & Exporters (“CME”) in the above-noted proceeding. Pursuant to Procedural Order #1 dated June 21, 2021, please consider this letter as CME’s Submissions regarding the application by EGI for a Multi-Year Natural Gas DSM Plan.

EGI applied to the Board for an “interim decision...approving the company’s proposed DSM activities in 2022 subject to necessary adjustments on a prospective basis” following the Board’s final order in this proceeding.<sup>1</sup> The interim determination was necessary, in EGI’s view, to “maintain DSM continuity into January 2022 and the 2022 program year”.<sup>2</sup> EGI also applied to the Board for final approval of its budget for 2022 as the “base budget envelope” which would be escalated for the remaining years in the 6 year plan term.<sup>3</sup>

In Procedural Order #1, the Board invited submissions from parties regarding EGI’s activities for the 2022 DSM program year. The Board cautioned parties to focus their submissions, and avoid submissions relating to other aspects of the application.<sup>4</sup> In Procedural Order #2, the Board determined that EGI’s request for a final approval of its proposed 2022 DSM budget was premature.<sup>5</sup>

CME’s understanding therefore, is that the Board has invited submissions specifically with respect to EGI’s 2022 DSM activities. Furthermore, it is CME’s understanding that the Board does not want parties to provide submissions on EGI’s proposed budget, targets, or incentive

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<sup>1</sup> EB-2021-0002, Exhibit A, Tab 2, Schedule 1, at para. 10.

<sup>2</sup> EB-2021-0002, Exhibit A, Tab 2, Schedule 1, at para. 9.

<sup>3</sup> EB-2021-0002, Exhibit A, Tab 2, Schedule 1, at para. 11.

<sup>4</sup> EB-2021-0002, Procedural Order #1, June 21, 2021 at p. 2.

<sup>5</sup> EB-2021-0002, Procedural Order #2, June 22, 2021 at p. 2.

mechanisms, which are to be determined by the Board with the benefit of a more comprehensive review of EGI's DSM plan.

In this context, CME does not object to an interim approval of EGI's 2022 activities for commercial and industrial customers, and agrees that continuity of DSM programming is beneficial. CME submits, however, that EGI should bear the risk that the details of the DSM framework, such as budget, targets, incentive mechanisms, costs, and expenses that are approved differ from those proposed or spent by EGI. It was within EGI's control to structure their application differently, or provide it earlier. Accordingly, the risks inherent in the application should be EGI's to bear.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of July, 2021.

Yours very truly



Scott Pollock

- c. Asha Patel (EGI)
- Dennis O'Leary (Aird & Berlis LLP)
- Alex Greco (CME)

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