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July 7, 2021

VIA E-MAIL

Ms. Christine Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2021-0002 Enbridge Gas Inc. Multi-year Natural Gas Conservation Framework
Submissions of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the submissions of VECC on Enbridge Gas's request for the OEB to approve 2022 DSM Plan activities. We have also directed a copy of the same to the Applicant.

Yours truly,

(Original Signed By)

John Lawford, Counsel for VECC

Copy to: Enbridge Gas Inc.

EB-2021-0002

Enbridge Gas Inc.

**Application for Multi-Year Natural Gas
Demand Side Management Plan (2022 to 2027)**

VECC Submissions July 6, 2021

Enbridge Gas Inc. (Enbridge Gas) filed a multi-year natural gas demand side management (DSM) plan application with the Ontario Energy Board (OEB) on May 3, 2021 under section 36(1) of the Ontario Energy Board Act, 1998. Enbridge Gas is seeking approval of a new natural gas DSM policy framework, effective January 1, 2022 in addition to approval of a new multi-year DSM plan, inclusive of budgets, programs and targets from January 1, 2022 to December 31, 2027.

As part of its application, Enbridge Gas requested an interim decision by August 31, 2021 approving its 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.¹ In Procedural No. 1 dated June 21, 2021, the OEB provided an opportunity for Intervenor and OEB staff to file submissions on Enbridge Gas's request for interim approval of its 2022 DSM program.

In addition, Enbridge Gas requested approval of its proposed 2022 budget, on a standalone final basis, as the "base budget envelope" for the 6-year DSM plan and the escalation methodology which Enbridge Gas proposed will increase the budget envelope in each year of the plan formulaically. In Procedural Order No. 2 dated June 22, 2021, the OEB determined that Enbridge Gas's request to approve its proposed DSM budget as the first step in this proceeding is premature as it requires a more comprehensive review of the proposed DSM plan. For the reasons discussed below, VECC believes it is also premature to approve the 2022 DSM program activities without a more comprehensive review.

Enbridge Gas's Low Income DSM Program proposal reflects continuation of the Home Winterproofing and Affordable Housing Multi-Residential offerings with certain enhancements as well as updates to low income eligibility requirements and other modifications including alterations to Indigenous offerings. Given the unique challenges and special needs of this customer segment, VECC is of the view that it is not appropriate to approve the 2022 DSM Plan ahead of a more thorough review of the proposed program objectives and outcomes for low income customers. VECC supports the continuation of 2021 Low Income DSM offerings in 2022. The 2022 DSM budget is directly related to the proposed 2022 programs and they need to be reviewed together.

Enbridge Gas indicates it is engaged with the IESO examining how to appropriately coordinate DSM and electricity CDM efforts geared to low income households across the province. Currently, Enbridge Gas and the IESO are in discussions exploring the possibility of a coordinated delivery of the single family low income offerings to allow for a single point of entry to province-wide programs for income eligible customers.² VECC supports this coordination and submits the OEB should underscore the importance

¹ Exhibit A Tab 2 Schedule 1 Page 3

² Exhibit E Tab 1 Schedule 3 P6-7

and timely nature of this work given the inherent efficiencies and increased opportunities to reach low income customers.

All of which is respectfully submitted.