

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

July 9, 2021

**Re: EB-2021-0002 Enbridge Multi-Year Demand Side Management Plan (2022 to 2027)  
Pollution Probe Submission on the Draft Issues List**

Dear Ms. Long:

In accordance with Procedural Order No. 2 dated June 22, 2021 for the above noted proceeding, please find Pollution Probe's submission pertaining to the Draft Issues List.

In addition to comments below on the Draft Issues List, Pollution Probe would like to highlight the value, efficiency and cost-effectiveness of coordinating several of these issues in a specific procedural manner. For example, if OEB Staff (or consultant) were able to harvest all the relevant policy documents, direction, etc. pertaining to the DSM plan and Framework, it would provide a consistent draft baseline for all parties to refer. This would include the types of documents highlighted in the Draft Issues List (e.g. DSM Mid-Term Review, relevant Directives and 2021 DSM Plan Decision), but also other relevant OEB direction and Decisions such as those from EB-2020-0192. To the extent that the OEB Staff can consolidate or facilitate activities that would otherwise needs to be duplicated across all participants, that would bring high value and consistency. Parties could recommend additions to the list if there are any gaps.

Pollution Probe would also like to reiterate the value of an early Stakeholder Conference as outlined in its letter dated May 31, 2021. The purpose of the Stakeholder Conference would be to promote alignment on understanding of the issues and provide an opportunity to build collaboration and efficiency in the process. The Stakeholder Conference is specifically more comprehensive than the 'Introduction Day' proposed by Enbridge, but the OEB could considered a 2 Day Stakeholder Conference with the morning of the first day including the Enbridge 'Introduction Day' presentation and questions related to the presentation.

Specific Comments Related to Draft Issues List

- Overall, the Draft Issues List is comprehensive and provides flexibility to bring in the issues required to assess the proposed DSM Plan, Proposed Framework and what is needed to bridge gaps.
- Unless there is a specific comment, Pollution Probe supports the Draft Issues List.
- For virtually all of the Draft Issues, if the answer is no, then it follows "If not, what should be done?". This may be implicit for each question, but should be mentioned for clarity.
- For draft issues 7b-j, Pollution Probe recommends adding "budget" to the list for each program.
- For draft issue #9, it is assumed that this includes all considerations including budgets. Could reword to ensure it is inclusive.

- For draft issue #13, it is recommended to add a part b – “Are changes to the proposed Enbridge Gas DSM Plan and/or Framework required due to the OEB’s Decision regarding Enbridge Gas’s Integrated Resource Planning proposal (EB-2020-0091)?”.

Thank you for the opportunity to provide input and comments.

Respectfully submitted on behalf of Pollution Probe.



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