

July 12, 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  
Issues List Submissions**

These are the submissions on behalf of the Ontario Greenhouse Vegetable Growers (OGVG) with respect to the proposed Issues List in the above noted proceeding.

While generally supportive of the proposed issues list, OGVG notes that there is no distinct issue with respect to the reasonableness of Enbridge Gas Inc.'s (EGI's) DSM proposal as it relates to maximizing participation by all of its customers. In EGI's application for approval of its 2021 DSM plan (EB-2019-0271) OGVG made submissions expressing concern that, within its contract rate classes, EGI appeared to rely heavily on repeat participation by some customers, while a significant number of customers had not participated at all, a concern that the OEB recognized in its decision approving EGI's 2021 DSM Plan:

*OGVG has a valid concern that a high percentage of Contract Class customers are not being reached, and it appears that DSM programs are providing benefits, including natural gas savings, mostly to repeat customers. The OEB agrees that enrolling new customers should be a priority and the information collection suggested by OGVG can be accomplished without compromising customer confidentiality, and should be considered by Enbridge Gas. These efforts may provide increased natural gas savings in 2021 and help inform the post-2020 DSM framework consultation process.<sup>1</sup>*

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<sup>1</sup> EB-2019-0271 Decision dated July 16, 2020, page 18.

Accordingly, OGVG respectfully submits that it may be appropriate to include the following issue:

*Does Enbridge Gas' proposed DSM Plan appropriately address the need to identify and reach as many new participants as possible?*

In the alternative, OGVG believes it may be sufficient to confirm that the issue of the appropriateness of Enbridge Gas' proposals as they relate to the need to identify and reach new customers that have not previously or recently participated in Enbridge Gas' various DSM programs is implicit throughout the existing issues list, particularly within the series of sub-issues under Issue 8. For example, OGVG would expect to explore the issue of identifying and reaching customers previously unserved by EGI's DSM programming largely under issue 8 c):

*Are Enbridge Gas's proposed program offerings for commercial customers appropriate?*

In this way, to the extent the issue of identifying and reaching unserved customers differs depending on nature of each class of customer, the issue will have been naturally dyvvied up based on EGI's proposal for each customer class.

Yours very truly,



Michael R. Buonaguro