

VIA E-MAIL

July 12, 2021

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

RE: EB-2021-0002 – EGI 2022-27 DSM – FRPO Submissions to PO#2

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in response to the Board's request for submissions on the Draft Issues List for the Enbridge 2022-2027 DSM Plan in Procedural Order No.2.

FRPO views the Draft Issues List as comprehensive providing for a broad examination of the plan including proposed changes from the company and those potentially submitted by others.

While the List is intentionally high-level, FRPO would like to identify an issue that we want to ensure is captured. In 2012 and 2013, prior to the previously-approved Generic Framework, Enbridge Gas Distribution formed a task group of representatives from the Low-Income Energy Network (LIEN), the Vulnerable Energy Consumers Coalition (VECC), the Green Energy Coalition (GEC) and FRPO to develop criteria for the eligibility of privately-owned multi-unit residential buildings to receive Low-Income DSM programs. Once the criteria were developed, the implementation was piloted by Enbridge bringing together United Way, City of Toronto, Toronto Hydro and FRPO to refine access strategies. The success of these strategies increased the reach of the Low-Income programs to many municipalities in Enbridge and eventually Union Gas territories.

In its evidence, EGI is proposing potential changes to those criteria¹. FRPO supports the advancement of evolutions designed to improve the efficacy of ratepayer investments in DSM. However, we believe these changes ought to be examined to ensure the evolution does not result in a regression.

As such, FRPO believes that the Board and ratepayers would benefit from an issue designed to address changes to eligibility criteria² specifically for Low Income programs. We respectfully submit the following additional issue would assist:

“Are Enbridge Gas’s proposed eligibility criteria for low-income participants appropriate?”

¹ Exhibit E, Tab 4, Schedule 6, Page 3

² FRPO notes that in the above reference, EGI is proposing evolutions to the single family income eligibility also.

In our view, this issue could be added as a sub-issue under issue 8. b.:

“Are Enbridge Gas’s proposed program offerings for low-income customers appropriate?”

We understand that the Board may determine that our proposed additional issue of eligibility criteria is subsumed under issue 8. b.. If so, we respectfully request that the Board identify it as such to allow for examination of the proposed changes and the potential impacts on the overall DSM Plan.

With the above issue considered and determined, FRPO supports the Draft Issues List proposed and thanks the Board for consideration of our submissions.

Respectfully Submitted on Behalf of FRPO,

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Principal
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c. A. Patel, EGIRegulatoryProceedings – EGI, Parties EB-2021-0002