

ONTARIO ENERGY BOARD

EB-2021-0002

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15,
Schedule B, as amended;

AND IN THE MATTER OF an application by Enbridge Gas Inc. pursuant to
Section 36(1) of the Ontario Energy Board Act, 1998, S.O. 1998, for an order or
orders approving its Demand Side Management Plan for 2022-2027.

SUBMISSION OF SMALL BUSINESS UTILITY ALLIANCE IN RESPONSE TO PROCEDURAL ORDER #2

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Small Business Utility Alliance (SBUA) submits the following comments in response to *PROCEDURAL ORDER NO. 2*, dated June 22, 2021, and the Ontario Energy Board's (OEB) proposed issue list.

SBUA appreciates OEB's comprehensive list of issues and proposes the following changes to Schedule A to assist in evaluating the needs of small businesses.¹ Underline indicates additions.

8. Has Enbridge Gas proposed an optimal suite of program offerings that will maximize natural gas savings and provide the best value for rate payer funding?

a. Are Enbridge Gas's proposed program offers for residential customers appropriate?

b. Are Enbridge Gas's proposed program offerings for low-income customers appropriate?

c. Are Enbridge Gas's proposed program offerings for large commercial customers appropriate?

d. Are Enbridge Gas's proposed program offerings for small and medium commercial customers appropriate?

The commercial class is not monolithic. Small commercial customers are an important ratepayer class with unique needs differing from larger commercial customers. We appreciate that Enbridge Gas has recognized some of the challenges this class faces in attempting to reduce gas consumption and the importance of tailoring programs to customer size:

"In terms of energy, small and medium sized businesses are very much focused on costs and will turn to associations for advice and support on how to lower their bills. They do not typically have tools, resources or internal staff to help them in understanding their usage and how to lower consumption on their own."²

"Customer size is an important consideration in assessing how best to engage with commercial customers. Although there are unique characteristics associated with the commercial segments described above, one common element in analyzing historical results is the lower level of participation associated with customers who consume less than 100,000 m³/year. In fact, during the 2015-2020 Multi-Year DSM

¹ Procedural Order #2, Schedule A.

² EB-2021-0002, Exhibit E, Tab 1, Schedule 4, Attachment 1, Page 43 of 74.


Plan, while approximately 19% of commercial accounts who consume more than 100,000 m3/year participated in DSM, only 2% of smaller commercial accounts participated.”³

Larger commercial entities have far greater resources to engage in demand side management programs than small businesses, and Enbridge Gas’ program offerings should not be identical across classes. It is reasonable for the scope of this proceeding to consider specifically whether Enbridge Gas has proposed appropriate program offerings for small and medium commercial customers.

We appreciate the opportunity to provide input on the scope of this proceeding.

Dated: July 12, 2021

Respectfully Submitted,

By: 
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³ EB-2021-0002, Exhibit E, Tab 1, Schedule 4, Page 5 of 36.