

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF Enbridge Gas Inc.'s Request for Approval of
Multi-Year Natural Gas Demand Side Management Plan (2022 to 2027)

**SUBMISSION OF
THE LOW-INCOME ENERGY NETWORK**

July 12, 2021

I. INTRODUCTION

1 In this proceeding, Enbridge Gas Inc. (“Enbridge”) is seeking approval of a new natural gas demand side management (“DSM”) policy framework and multi-year DSM Plan (2022-2027). The Low-Income Energy Network (“LIEN”) sets out below LIEN’s submissions in response to the Ontario Energy Board’s (the “OEB”) request for written submissions on the Draft Issues List, attached as Schedule A to Procedural Order No. 2 dated June 22, 2021.

II. LIEN’S SUBMISSIONS ON THE DRAFT ISSUES LIST

2 LIEN offers the following amendments to and comments about the Draft Issues List to ensure the issues are sufficiently comprehensive to address LIEN’s concerns and define the scope of the proceeding.

A. ISSUE 4

3 Issue 4 states

Is Enbridge Gas's proposed DSM policy framework, including guiding principles and guidance related to budgets, targets, programs, evaluation, and accounting treatment appropriate?

4 LIEN proposes amending Issue 4 to include reference to stakeholder engagement in Enbridge's DSM policy framework:

*Is Enbridge Gas's proposed DSM policy framework, including guiding principles and guidance related to budgets, targets, programs, evaluation, **stakeholder engagement** and accounting treatment appropriate?*

5 LIEN recognizes that Issue 15 considers stakeholder engagement as a separate issue, but for completeness, LIEN would recommend adding stakeholder engagement to Issue 4 as well.

B. ISSUE 5

6 Issue 5 states

Does Enbridge Gas's proposed budget, including program costs, portfolio costs and cost recovery approach result in reasonable rate impacts while addressing the OEB's stated DSM objectives in its letter issued on December 1, 2020?

7 LIEN proposes amending Issue 5 to state

*Does Enbridge Gas's proposed budget, **for each of the years 2022-2027 (inclusive)**, including program costs, portfolio costs and cost recovery approach result in reasonable rate impacts while addressing the OEB's stated DSM objectives in its letter issued on December 1, 2020?*

8 LIEN is interested in Enbridge's budget for each of the years of 2022-2027, inclusive. Enbridge sought early approval from the OEB on a standalone final basis of the budget proposed for 2022 as the "base budget envelope" for the 6 year DSM Plan and the escalation methodology, which will increase the budget envelope in each year

of the plan formulaically. Enbridge did not request interim approval of the 2022 DSM budget in the event that the OEB did not provide early approval.

9 The OEB indicated it will not grant early approval of the 2022 DSM budget. In Procedural Order No. 2, 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.

C. A NEW ISSUE 16: ENBRIDGE'S IRP PROPOSAL

10 LIEN recommends including a new issue about how Enbridge proposes to integrate Enbridge's Integrated Resource Planning (or "IRP") with Enbridge's 2022-2027 DSM plan:

Has Enbridge Gas proposed a reasonable approach to ensure that Enbridge Gas's Integrated Resource Planning Proposal, if approved by the OEB, will be effectively coordinated with Enbridge Gas's 2022-2027 DSM Plan?

11 Enbridge requested that the OEB determine that Enbridge's IRP Proposal, which would allow Enbridge to consider and include non-pipeline solutions or integrated resource planning alternatives ("IRPAs") instead of natural gas facilities, is reasonable and appropriate for application to future Enbridge projects. The OEB has not yet rendered its decision on Enbridge's IRP Proposal (OEB File No. EB-2020-0091). LIEN seeks to understand how the OEB's decision on Enbridge's IRP Proposal will integrate with Enbridge's 2022-2027 Natural Gas DSM Plan.