

July 19, 2021

Ontario Energy Board
By electronic filing and e-mail

Attn: Christine E. Long, Registrar and Board Secretary

Dear Ms Long:

Re: EB-2021-0002, EGI 2022-27 DSM – GEC Reply Submission on Draft Issues List

Pursuant to P.O. 2 in this matter, please be advised that GEC offers the following comments in response to the submission of Enbridge Gas on the draft issues list.

Enbridge argues that “undertaking a broad comparison of multiple DSM regimes and DSM best practices should be outside the scope of this proceeding... This could inevitably lead to the withdrawal of the current Application and the need to generate a totally new application many months down the road.” GEC submits that this request amounts to an attempt to replace the Board’s directed framework review with a mere framework extension. While we recognize that the Board has enunciated certain goals in its DSM letter, it has not, and should not, constrain the evidence and issues in the manner that the company suggests such that learning and improvements are needlessly constrained.

EGI has suggested a preliminary issue addressing amortization and cost recovery be considered prior to any detailed plan review as changes to that element could in its view require a reworking of the programs or scorecards. GEC does not see how amortized recovery would require a refiling as opposed to an adjustment that could be managed as part of regulatory implementation. We do agree that reducing the risk of the need for a complete refiling and rehearing is desirable. In its submissions on the 2022 program GEC suggested that EGI be directed to offer alternative plans based on alternative budgets to avoid the potential need for a subsequent re-filing. We reiterate that suggestion. Similarly, directing Enbridge to file fuller evidence at the outset on system savings, DRIPE, and rate impact amelioration due to historic participation, would reduce the likelihood of a need for a subsequent refiling.

Sincerely,



Cc: All parties