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Enbridge Gas Inc.
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VIA RESS and EMAIL

July 19, 2021

Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Christine Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No.: EB-2021-0002
Multi-Year Demand Side Management Plan (2022 to 2027)
Reply Submission – Draft Issues List - Reply Submission**

In accordance with the OEB's Procedural Order No. 2, dated June 22, 2021, enclosed please find Enbridge Gas's reply submission on the Draft Issues List for the above noted proceeding.

The above noted submission has been filed electronically through the OEB's RESS.

Should you have any questions on this matter please contact the undersigned at 416- 495-5642.

Sincerely,

Asha Patel
Technical Manager, Regulatory Applications

cc: D. O'Leary, Aird & Berlis
Intervenors (EB-2021-0002)

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 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.**

REPLY SUBMISSION OF ENBRIDGE GAS INC. IN RESPECT OF THE DRAFT ISSUES LIST

Pursuant to Procedural Order No. 2, this is the Reply Submission of Enbridge Gas Inc. (“**Enbridge Gas**” or the “**Company**”) to the submissions made by various stakeholders to the draft Issues List which was appended to the OEB’s Procedural Order No. 2 dated June 22, 2021.

Enbridge Gas wishes to reiterate its concerns as expressed in its earlier submission that preliminary issues should be dealt with up front so that all parties then have the benefit of the OEB’s decision in respect of same before launching into a consideration of the details of the multi-year plan. The reason for this is self-evident and practical. If the OEB accepts the submissions of certain parties that fundamental changes are required to the framework as proposed or that the annual budgets should be materially increased, it then follows that the Company will have to make changes to the Application to reflect the OEB’s decision on the preliminary issues. Enbridge Gas does not believe that hearing the preliminary and fundamental issues contemporaneously with the balance of the application will result in any material shortening of the

proceeding, to the contrary, Enbridge Gas believes ensuring all parties have clarity upfront on fundamental DSM elements will in fact allow for a more efficient and meaningful review of the proposed DSM Plan.

The following stakeholders made submissions on the Issues List: Anaawatin, APPrO, FRPO, IGUA, LIEN, OGVG, Pollution Probe, Small Business Utility Alliance and SEC.

The balance of stakeholders either did not make any submissions or indicated they are content with the draft Issues List as proposed.

Enbridge Gas will accordingly primarily respond to the submissions made in respect of the Issues List by the parties identified above.

Several stakeholders ask that the customer groups that they represent be specifically identified in an issue. Anaawatin requests that the Issues List specifically identify indigenous customers. The Small Business Utility Alliance requests that the Issues List specifically reference small and medium commercial customers. APPrO requests that gas-fired generators be specifically identified as one of the large volume customers.

Enbridge Gas believes that there is no need to specifically identify customers or customer groups as the issues are intended to apply to all customers. Enbridge Gas notes that the revised Issues List it submitted specifically refers to ratepayers and customer groups at issue 6. These terms are all encompassing and it is submitted there is no need to identify every customer group specifically.

LIEN asked for the term “stakeholder engagement” to be included in issue 4 of the OEB Staff’s draft Issues List. While Enbridge Gas understood that stakeholder engagement

or consultation is an issue that parties could consider in respect of the proposed new framework and under the multi-year plan, Enbridge Gas has no objection to including stakeholder engagement in the first bullet of issue 3 of its revised draft Issues List (Appendix 1 of its submission).

LIEN also asked that the draft Issues List be amended to specifically include reference to each of the years “2022-2027 (inclusive)”. Enbridge Gas does not believe such an addition is necessary. There is no question that these are the years at issue in this proceeding and that budget approvals are sought for each of these years.

SEC submits that several matters that it may raise during the course of the proceeding appear to be contemplated by several of the issues. Enbridge Gas agrees that the framework issues identified by SEC are contemplated by the draft Issues List and the Issues List as revised and amended by Enbridge Gas. Enbridge Gas repeats its earlier submission that such preliminary matters should be dealt with upfront. If there are going to be fundamental changes to the framework which will impact the DSM Plan as filed, they need to be dealt with early so that parties will know whether there is any point in proceeding with the consideration of the Multi-Year DSM Plan as filed.

SEC also makes reference to issues that were dealt with extensively during the Integrated Resource Planning (IRP) proceeding. As Enbridge Gas noted in its July 12th submissions on the Issues List, while it is appropriate to have an issue that considers whether any changes are required to the Multi Year DSM Plan as filed as a result of the decision made by the OEB in the IRP proceeding, Enbridge Gas requested that the OEB confirm that this proceeding will not permit parties to introduce evidence, ask interrogatories and make

submissions which were the subject of the IRP proceeding. Enbridge Gas submits that the issue should be limited solely to whether changes are required to the Multi Year DSM Plan as filed in the event that a decision is ultimately issued by the OEB in the IRP proceeding. These comments also apply to the submissions made by LIEN and Pollution Probe which also appear to want this proceeding to evolve into a further consideration of IRP matters.

FRPO has submitted that the Issues List should specifically include as an issue the eligibility criteria for low-income participants. Notwithstanding, as noted in the pre-filed evidence, Enbridge Gas consulted with and sought feedback from Low Income stakeholders in the development of the Application, including a representative from FRPO, regarding a number of matters including refinements to the Multi Residential Affordable Housing eligibility criteria, Enbridge Gas submits that the draft Issues List and the amended and regrouped Issues List proposed by Enbridge Gas is already sufficiently broad to address this issue.

OGVG requests the inclusion of an issue asking if the DSM Plan appropriately addresses the need to identify and reach as many new participants as possible. Enbridge Gas acknowledges that encouraging widespread participation has always been an aim. This guiding principle exists in the current DSM Framework and it is proposed for the new framework filed in this proceeding. Enbridge Gas believes that this issue is consumed in the list of general issues set out in its amended Issues List and does not need to be set out separately given the above.

APPrO requests that the issue relating to large volume customers make it clear that the issue include consideration of the overlap with climate change and emissions reduction programs that already apply to gas-fired generators. Enbridge Gas believes that such issues are included in the issue as currently worded and that it is not necessary to specifically list all the possible issues and concerns that affects all large volume customers.

IGUA has requested that the issue dealing with the coordination between DSM and CDM programs be expanded to also reference GHG reduction programs. Again, the Company believes that these amendments are not necessary, but it has no objection.

Finally, while ED and GEC did not propose any changes to the draft Issues List, from their submissions in respect of the request for an interim order for the 2022 DSM Program year it is clear that they view as relevant challenging what the OEB has stated is the primary objective of natural gas DSM.

At page 2 of the OEB's December 1, 2020 DSM Letter of Direction¹, the OEB stated:

*As part of Phase 1 of the OEB's consultation, the OEB received written comments from 25 stakeholders regarding the goals and objectives of ratepayer-funded DSM. **Following its review and consideration of the submissions, the OEB is of the view that the primary objective of ratepayer-funded natural gas DSM is assisting customers in making their homes and businesses more efficient in order to help better manage their energy bills.** (emphasis added)*

It is clear from the primary objective set by the OEB that DSM participants should be natural gas ratepayers, i.e. Enbridge Gas customers. Thus, the use by the OEB of the word "customers". The Company asks that the OEB specifically remind parties of this

¹ EB-2019-0003 OEB Letter of Direction (December 1, 2020)

and rule as irrelevant attempts to raise issues which are inconsistent with the primary objective.

All of which is respectfully submitted this 19th day of July, 2021.



Dennis M. O'Leary
Counsel to Enbridge Gas Inc.