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By electronic filing

July 19, 2021

Christine Long
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. (“EGI”)
Application for Multi-Year Natural Gas Demand Side Management Plan (2022 to 2027)
Board File #: EB-2021-0002**

We are counsel to Canadian Manufacturers & Exporters (“CME”) in the above-noted proceeding. Pursuant to Procedural Order #2 dated June 22, 2021, please consider this letter as CME’s submissions in reply to the submissions delivered by other parties.

In its July 12, 2021 submission, EGI proposes that the OEB limit consideration of the program 2022 program year which is subject to an interim decision of the OEB, particularly the operation and expenditure of the 2022 program offerings.¹ CME disagrees. The Board’s review of EGI’s application should consider all aspects of the proposed DSM and plan, including the 2022 year, its programs, operations, and expenditures. While time constraints may make it necessary to provide an interim determination regarding certain aspects of the 2022 year in advance, EGI had the power to structure and time their application. Accordingly, the Board, and parties, should not be deprived of a full review of EGI’s application due to time constraints occasioned by EGI’s application.

EGI also takes the position that a review of DSM framework elements and approaches from other jurisdictions in North America. EGI stated that this should be outside the scope of the current proceeding since there is no accepted definition of “best practices” and parties could try to argue against the “foundational concepts” of DSM.² According to EGI, it might then be required to withdraw the current application.³

CME submits that a broad based review should be within scope for this proceeding. EGI applied for the Board’s approval for a DSM framework and plan from 2022-2027. EGI also provides natural gas distribution service for the vast majority of Ontarians. As a result, whether or not

¹ EGI Submission on the Draft Issues List, July 12, 2021, p. 2.

² EGI Submission on the Draft Issues List, July 12, 2021, p. 3.

³ EGI Submission on the Draft Issues List, July 12, 2021, p. 3.

the Board has undertaken this proceeding on a generic basis, ultimately, this DSM framework will be Ontario's operative framework for the next six years. Accordingly, the Board should seek to understand and benefit from other jurisdiction's best practices. The OEB itself can determine what it believes the best practices are from other jurisdiction, and how they should be applied to EGI. Moreover, the Board can also determine if certain foundational concepts are out of scope without throwing out the jurisdictional review in its entirety.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 19th day of July, 2021.

Yours very truly



Scott Pollock

- c. Asha Patel (EGI)
- Dennis O'Leary (Aird & Berlis LLP)
- Alex Greco (CME)

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