

Ms. Christine Long
OEB Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

July 22, 2021

**Re: EB-2021-0002 Enbridge Multi-Year Demand Side Management Plan (2022 to 2027)
Pollution Probe Response to Enbridge Reply on 2022 DSM Program Year**

Dear Ms. Long:

Pollution Probe is in receipt of the Enbridge Reply Submission letter dated July 20, 2021 and provides the following comments in response to certain assertions or allegations included in the Enbridge Reply Submission related to Pollution Probe.

Firstly, Enbridge suggested that the Pollution Probe submission dated July 6, 2021 went beyond the scope requested by the OEB. Pollution Probe emphatically disagrees with that assertion. All issues included in the Pollution Probe submission relate to the 2022 DSM Plan year, either as a stand-alone year or as the base year for a multi-year DSM plan. Procedural Order No.1 focused on submissions related to interim approval by August 31, 2021, of Enbridge Gas's 2022 DSM program year plan. In order to assess the appropriateness of interim approval, all related impacts need to be considered. Even before Procedural Order No. 2 was issued one day after Procedural Order No. 1, it was clear that Enbridge's filing is an integrated proposal and that interim approval of the 2022 DSM Plan can't be provided without consideration of the cumulative impacts that would result. Additional clarity supporting this understanding was provided in OEB Procedural Order No. 2.

Enbridge suggests that Pollution Probe may be trying to reopen the gas IRP proceeding (EB-2020-0091) by providing complimentary materials that relate to DSM portfolio, consumer needs and industry best practices. Let there be no mistake that Pollution Probe is not intending to reopen the gas IRP proceeding and eagerly awaits the OEB's imminent Decision for that proceeding. DSM happens to be one of the most cost-effective IRP options and what results from this proceeding will affect the level of consumer and community benefits resulting from DSM. Pollution Probe intends to continue to provide information on value added industry best practices and related materials in an expeditious manner to assist the OEB in meeting the needs of Ontario consumers and communities. By including relevant materials early in the proceeding, Pollution Probe believes it can only aide the process. Holding back or providing these materials late in the process would be of less value to everyone.

Enbridge's preference for immediate interim OEB approval is no secret. The OEB has already determined that "Enbridge Gas's request to approve its proposed DSM budget as the first step in this proceeding is premature." and that the "OEB requires a more comprehensive review of the proposed DSM plan" [Reference: Procedural Order No. 2). It does seem appear appropriate for Enbridge to wait until July 20, 2021 to include additional information that was not available for stakeholders when they completed their submissions and reply submissions in alignment with Procedural Orders Nos 1 and 2. Pollution

Probe is hopeful that any additional information can be shared with stakeholders as soon as possible. With new information included in Enbridge's 41 page Reply Submission, it would have been appropriate to include that information earlier and focus purely on Reply to stakeholders submissions on interim approval of the 2022 DSM Plan. Pollution Probe does not intend to address the additional information in this letter and assumes that there will be a future procedural opportunity to ask about the new information and provide comments. Providing the opportunity for all stakeholders to provide reply comments at the same time as done for the Draft Issues List could help resolve that issue for the residual of this proceeding.

Finally, Enbridge indicates in Section 12 of its Reply Submission, "Enbridge Gas notes that there were no specific concerns expressed about these "new" program offerings (aside from the concern expressed by ED and GEC in respect of natural gas heat pumps). In other words, there has been no specific problem identified about these program offerings." Based on the Pollution Probe's interpretation of Procedural Order No.1, it did not include program specific comments in its submission and understands that there will be opportunity through future procedural orders to provide those comments. It does not appear to be a reasonable assumption that a lack of comments at this time translates to stakeholders accepting the programs as filed. It is not possible at this time to make that determination. Should the OEB require additional comments related to programs at this time, it is recommended that this clarity be provided. In Pollution Probe's view, it is more appropriate to consider program gaps and additions as part of the integrated DSM portfolio discussion.

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

cc: Enbridge (email via EGIRegulatoryProceedings@enbridge.com)
Dennis O'Leary, Aird & Berlis (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)