

September 1, 2021

Ontario Energy Board
2300 Yonge Street, 27floor
Toronto, ON M4P 1E4

Attention: Christine Long, Registrar and OEB Secretary

Dear Ms. Long:

**Re: Enbridge Gas Inc. ("Enbridge Gas") – Application for Approval of a Multi-Year Natural Gas DSM Plan (2022-2027)
EB-2021-0002
Request for Extension to File Updated Pre-Filed Evidence**

We are counsel to Enbridge Gas and are writing in respect of the Ontario Energy Board's ("OEB") Decision and Order dated August 26, 2021 ("**Decision**") which dealt with Enbridge Gas' 2022 DSM activities. In the Decision, the OEB ordered that Enbridge Gas's 2021 DSM plans for the EGD and Union rate zones be extended for 1 year effective January 1, 2022 and that Enbridge Gas use the performance scorecards provided in the appendices of the Decision for its 2022 DSM programs. The Decision further provided that Enbridge Gas may make updates to its pre-filed evidence related to its 2023-2027 DSM activities in response to the Decision. The Decision requires updates of pre-filed evidence to be filed by September 16, 2021. For the reasons set out below, Enbridge Gas seeks a short extension to September 30 for the filing of updated pre-filed evidence.

As the OEB and parties to this proceeding will have noted, the pre-filed evidence filed by Enbridge Gas contemplated the integration of program offerings between the EGD and Union rate zones. Accordingly, the proposed scorecards and targets were generated based upon this integration and the use of 2022 as the base year. These scorecards and targets will need to be updated to both remove 2022 and to make 2023 the new base year. As well, references throughout the pre-filed evidence which repeat or refer to the currently filed scorecards and targets and evidence which relates to 2022 DSM activities will need to be amended. This necessitates a complete review of the entirety of the pre-filed evidence.

While the update will likely be mostly mechanical in nature to match the new five year term of the DSM Plan with the same portfolio of program offerings, some changes to structural elements of the proposed multi-year plan may require modification including, for example, the three year scorecards which were originally proposed.

Given the extent of the anticipated updates that are required, Enbridge Gas proposes to file a complete updated evidentiary package. It is believed that this would be welcomed by the OEB and all parties as it will provide for a clear and complete evidentiary record for the balance of this proceeding. Simply filing numerous pages of amended evidence to be inserted into the current record will unnecessarily complicate matters and could lead to confusion.

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In the end, Enbridge Gas believes that the updates to the pre-filed evidence will be fairly time intensive and does not believe that it can complete all of the calculations necessary to amend the scorecards and targets and update the prefiled evidence for filing by September 16. It therefore seeks a brief extension for the filing of the updated evidentiary package of two weeks to September 30, 2021. Enbridge Gas presumes that this short extension will not impact other steps contemplated for this proceeding including the preparation of draft interrogatories and intervenor evidence.

Yours truly,

AIRD & BERLIS LLP



Dennis O'Leary

cc. Intervenors (EB-2021-0002)

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