

# Elson Advocacy

October 26, 2021

**Ms. Christine Long**

Registrar

Ontario Energy Board

2300 Yonge Street, 27th Floor

Toronto, Ontario

M4P 1E4

Dear Ms. Long:

**Re: Enbridge 2022 to 2027 Demand Side Management (“DSM”) Plan  
EB-2021-0002**

I am writing on behalf of Environmental Defence to request an amendment to the schedule to allow Enbridge to update its programs in light of Greener Homes Grant. This would lead to much greater regulatory efficiency and reduce the possibility of delay.

## **The Greener Homes Grant**

The federal government announced the details of its Greener Homes Grant after Enbridge had already designed its DSM programs. Major revisions to Enbridge’s programs are required as a result. Most obviously, Enbridge’s \$30 million whole home residential program is no longer tenable in its current form in light of the Greener Homes Grant. This is because the federal government program strives for greater savings through higher incentive levels. For example, the Greener Homes Grant offers \$125 per Energy Star window whereas Enbridge offers \$40.<sup>1</sup> Similarly, the Greener Homes Grant offers \$5,000 for R20 exterior wall insulation whereas Enbridge offers \$3,000. For R12, the difference is \$3,800 from the Greener Homes Grant and \$1,750 from Enbridge.

Other Enbridge programs are likely impacted as well because the Greener Homes Grant applies to multi-unit residential buildings (MURBs). Therefore, the federal grants impact *at least* \$30 million of the proposed DSM spending, likely more. Enbridge could propose to address this in any number of ways. For example, it could seek to coordinate and efficiently deliver programming in co-operation with the federal government, it could redesign its residential programs, or it could re-allocate the investments to other sectors. The impacts will be very significant and could extend beyond the residential programs in a number of ways.

It would be most efficient and effective for Enbridge to update its evidence to address this as soon as possible. If this does not occur, all of the intervenor evidence will be based on old and outdated proposals for a large portion DSM budget. This would have the following negative consequences:

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<sup>1</sup> EB-2021-0002, Exhibit E, Tab 1, Schedule 2, Page 12; Natural Resources Canada, Eligible Grants ([link](#)).

- Raising the cost of the expert evidence;
- Resulting in a more convoluted record; and
- Causing delay.

We therefore request that the schedule be adjusted to include a step for Enbridge's evidence to be updated or supplemented to address the Greener Homes Grant prior to the deadline for expert evidence.

#### **Alternative Request – Extension of Expert Evidence Deadline**

In the alternative, if the Board does not adjust the schedule for an evidence update, we request that the deadline for intervenor evidence be moved back by 10 business days to December 10, 2021. The current schedule provides only 9 business days between the receipt of Enbridge's interrogatory responses and the preparation of intervenor evidence. This will be a major challenge for Mr. Neme and Dr. McDiarmid's evidence due to other commitments and the volume of work to be completed in a short period. Although some work can proceed before the receipt of interrogatory responses, a great deal requires those interrogatory responses. Extending the evidence deadline will result in a better and more helpful product for the OEB's consideration.

In an attempt to proactively address this issue, we filed our interrogatories very early. We filed them on October 12<sup>th</sup> and they were due on October 22<sup>nd</sup>. However, Enbridge has advised us that it will likely not be able to provide responses by a correspondingly early date. We are therefore seeking an extension of the evidence deadline. However, if the schedule is adjusted to allow an update of Enbridge's evidence in light of the Greener Homes Grant, that will also resolve the intervenor evidence timing issues and an additional extension will not be required.

Yours truly,



Kent Elson

cc: Parties to the above proceeding