



Ms. Nancy Marconi
Acting Registrar
Ontario Energy Board
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Toronto, ON M4P 1E4

Sent via email to registrar@oeb.ca

EB-2021-0002 – Enbridge Multi-Year Demand Side Management Plan Clean Air Council Letter

Dear Ms. Marconi:

The [Clean Air Council](#) (CAC) is a network of over 30 Ontario municipalities working collaboratively on clean air and climate change actions. Clean Air Partnership (CAP), a charitable environmental organization facilitates the CAC network. CAC members and CAP have coordinated with Pollution Probe in several municipal stakeholder sessions to provide feedback and we understand that Pollution Probe will continue to share that consolidated feedback with the OEB through the DSM proceeding.

The below input and recommendations represent the consensus feedback from the municipal staff member representatives from CAC member municipalities into the OEB's current 2023-2027 DSM plan proceeding and related DSM Framework. The OEB has acknowledged the difficulty that stakeholders such as municipalities have to keep abreast of relevant OEB proceedings and participate in a meaningful manner. The OEB's recent RPPAG report highlighted the need to enhance stakeholdering and engagement with Ontario municipalities. The CAC is very keen to work with the OEB to facilitate and collate municipal input on important initiatives such as the Demand Side Management (DSM) proceeding. CAP is available to facilitate municipal/OEB discussions.

No meaningful consultations were conducted by Enbridge prior to filing its proposed DSM plan and proposed draft Framework. This provides a significant consultation gap prior to the DSM

application and we request that the OEB put in place requirements for meaningful consultation with all stakeholders prior to filing DSM plans in the future.

Ontario municipalities including CAC members have had an opportunity to partner with Pollution Probe to learn about the OEB's proceeding to consider DSM programs, funding and framework for 2023-2027. We wanted to provide this letter to highlight the importance of increased DSM funding, programs, consultation and results in alignment with municipal energy and emissions plans.

Ontario's municipalities include all Ontario's energy consumers that are the intended target of DSM programs. Municipalities across Ontario have been developing integrated energy and emissions plans that include significant energy and emission reductions. Leveraging all cost-effective DSM aligns with achieving these goals. DSM is the most cost-effective energy option available to Ontario consumers and should be considered as Ontario's first energy resource. Below are some recommendations that we believe the OEB should consider including in its decision for this proceeding.

- Significantly increase to DSM budgets in the range of at least double the current 2022 DSM budget.
- Direct Enbridge to develop a DSM plan to deliver all cost-effective DSM in alignment with the OEB Potential Study and file it for OEB consideration at the mid-term review of the 2023-2027 DSM Plan.
- Include in the DSM Framework a requirement for meaningful consultation with Ontario stakeholders including municipalities prior to Enbridge finalizing and filing any DSM plans.
- We encourage the OEB to significantly enhance the stakeholder and communication process for DSM. The OEB should direct Enbridge to enhance its IRP website (mandated by the OEB in EB-2020-0091) to include all DSM consultation, communications and enhance the ability for stakeholder input. This will ensure that stakeholders have a spot to get real time information and provide input on an ongoing basis. The website should also include an option for stakeholders to submit their email address to receive all updates and communications. This is standard practice for effective websites developed for consultation purposes.
- The OEB should ensure that DSM and IRP are linked in planning and delivery by Enbridge since they affect the same energy and emission issues for consumers and communities across Ontario. Artificial separation of these issues is inefficient and results in silos.
- DSM programs are currently developed without consideration of other relevant programs and stakeholders. The OEB should direct Enbridge to leverage other energy

reduction initiatives where possible and provide support to those initiatives when they are more cost-effective than an Enbridge only program approach. Where municipalities have programs that align with DSM goals, Enbridge should provide capacity to support these local initiatives. The same should occur for other programs delivery partners such as IESO to reduce Enbridge internal and program overheads.

- Support fuel switching, including promoting hybrid heating or electrification when appropriate.
- Direct Enbridge to ensure that the DSM plan coordinates with and supports Ontario municipalities that are developing and implementing community energy/climate plans to reduce natural gas use (i.e. DSM) and related emissions. This is one of the most cost-effective ways to leverage local activity to achieve incremental DSM results in a coordinated manner.

The Clean Air Council would again like to extend an invitation to the OEB to discuss these recommendations and other questions in more detail. Please contact Gabriella Kalapos at gkalapos@cleanairpartnership.org to organize an OEB/municipal discussion.