

5.5 Requests from Other Stakeholders

The OEB received written comments from 10 non-utility stakeholders as part of the Mid-Term Review consultation. In addition to comments on the natural gas utilities' requests, some stakeholders provided new suggestions for the OEB's consideration.

Environmental Defence (ED) and the Green Energy Coalition (GEC) filed a joint submission. ED and GEC made a number of recommendations that are summarized below.

Amortize DSM Costs

ED and GEC suggested that the OEB consider amortizing DSM costs. Specifically, they suggested that a portion of the natural gas utilities' 2019 and 2020 DSM costs be amortized over the lifetime of the energy efficient equipment installed. Additionally, they suggested that the OEB explore amortizing all DSM costs for the post-2020 DSM framework. The benefits of amortizing DSM costs include:

- Softening rate impacts – spreading the cost over 15 years will enable participants to pay for the cost of the DSM program with the savings from reduced gas usage.
- Consistency with supply-side investments – the cost of the natural gas utilities' new capital infrastructure is amortized over a period of time.
- Intergenerational fairness – amortization decreases the number of customers that pay for DSM programs but do not benefit.
- Allows for greater expansion of cost-effective DSM – reduces the amount of upfront costs, allowing for a greater breadth of programming to be implemented.

OEB Conclusion

Stakeholders who commented on this concept were generally supportive of continuing the discussions as part of the post-2020 DSM framework development. The OEB agrees that amortizing DSM costs over the lifetime of the energy efficiency programs should be explored during the post-2020 DSM framework development.

5.5.1 Accurately Account for Carbon Costs

ED and GEC suggested that the OEB include carbon costs to the DSM screening and cost-effectiveness analyses while maintaining the 15% non-energy benefit adder. The