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December 21, 2016

VIA RESS, EMAIL and COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Distribution Inc. (“Enbridge”)
Ontario Energy Board (“Board”) File Number EB-2016-0246
Joint Submission by Enbridge Gas Distribution Inc. and Union Gas Limited**

Enbridge Gas Distribution Inc. (“Enbridge”) and Union Gas Limited (“Union”), (collectively the “Utilities”) jointly bring the attached application seeking the approval of the Ontario Energy Board (the “Board”) for new and updated DSM measures and the Technical Reference Manual (“TRM”) (together the “Application”).

In the DSM Guidelines for Natural Gas Utilities (EB-2008-0346), the Board directed the Utilities to make an annual application to update input assumptions and encouraged the Utilities to file a joint application. Pursuant to the Joint Terms of Reference on Stakeholder Engagement for DSM Activities by Union and Enbridge (“ToR”) dated November 4, 2011, one of the Technical Evaluation Committee’s (“TEC”) primary task was the development of a TRM for natural gas DSM activities.

Under cover of a letter dated December 16, 2015 the Utilities jointly filed an application for approval of new and updated DSM input assumptions (EB-2015-0344) (the “2015 Update”). In response to the 2015 Update, the Board issued a letter dated April 26, 2016 which stated that a preliminary review of the 2015 Update application determined that it was not required at the time and therefore would not be processed. The Board referenced the ongoing work on the TRM and stated its expectation that when the TRM is finalized, the Utilities would file an update to the 2015 Update application. Consistent with the Board’s directive, this Application therefore seeks approval for both new and updated DSM measures and the TRM.

The TRM is the culmination of several years of effort with the Utilities working with the joint TEC and the TRM sub-committee which was struck for the purposes of ultimately finalizing the TRM. In consultation with the TEC, a determination was made as to those measures which should undergo a review for the purposes of the TRM. This resulted in the generation of a prioritized list of measures which were provided to the third party consultant, Energy & Resource Solutions (“ERS”), retained by the TEC to assist with the development of the TRM. The TEC included representatives from each of the Utilities, Mr. Chris Neme, Ms. Julie Girvan and Mr. Jay Shepherd. It also included two independent members, Mr. Bob Wirtshafter and Mr. Ted Kesik. The TRM sub-committee included Mr. Chris Neme and Mr. Ted Kesik.

Since the 2015 Update was filed, ERS has completed its work and the first version of the TRM is included in this Application. The TRM includes all new and updated measures and related substantiation documentation. In addition, an Ontario TRM glossary, TRM Common Assumptions Table and a TRM Front Section (which provides an overview of the TRM) have been developed and are included.

After much effort, the TRM is now in a form where each of the members of the TEC and TRM sub-committee agree that the TRM should be filed with the Board. All of these members with one exception endorse the TRM as filed. While Mr. Shepherd has expressed concerns about several specific matters, he is not opposed to the filing of the TRM as it is believed that these issues can be addressed as part of this Application.

While it is an objective of the ToR that a consensus be reached where possible, the ToR specifically note at page 10 that: "The Committee will endeavour to reach consensus on its recommendations. Where consensus is not reached, the Committee members will outline their respective positions in the appropriate Board processes (...annual submission to Update Input Assumptions...)". Accordingly, the Utilities are of the view that it is appropriate at this time to file the TRM for review by the Board.

Consistent with section 8 of the 2015-2020 Multi-Year DSM Framework (EB-2014-0134) and the Boards stated intent of coordinating the process to annually update input assumptions, Board Staff were involved in various TEC and TRM sub-committee meetings and received copies of communications over the course of the year leading to the completion of the TRM.

This Application seeks approval for an update to the Summary Table of Measure Assumptions and Substantiation Documents, and the TRM.

This Application includes:

- Current approved Summary Table of Measure Assumptions and Substantiation Documentation as updated by the 2015 Update and the subsequent work of ERS and the TEC;
- TRM Front Section
- TRM Glossary
- TRM Common Assumptions Table
- Union's Custom EUL Table
- Enbridge's Measure Life Guide

- Measure Assumptions previously included as part of the 2015 Update:
 - Residential Adaptive Thermostat (New Construction/Retrofit)
 - Commercial Condensing Tankless Gas Water Heater (New Construction/ Time of Natural Replacement)
 - Commercial Kitchen Demand Controlled Ventilation (Retrofit)
 - Commercial Kitchen Demand Controlled Ventilation (New Construction/Time of Natural Replacement)
 - Commercial Condensing Make Up Air Unit (New Construction/Time of Natural Replacement)
 - Commercial Condensing Storage Gas Water Heater (New Construction/Time of Natural Replacement)
 - Commercial Condensing Unit Heater (New Construction/Time of Natural Replacement)
 - Commercial Infrared Heater (New Construction)
 - Commercial Infrared Heater (Retrofit)

- Commercial Pre-rinse Spray Nozzle (New Construction/Time of Natural Replacement/Retrofit)
- Residential Programmable Thermostat (Retrofit)
- Residential High Efficiency Condensing Furnace (New Construction/Time of Natural Replacement)
- Residential Low-Flow Showerheads
- Residential Tankless Water Heater (New Construction/Time of Natural Replacement)
- Commercial Air Curtains (New Construction/Retrofit)
- Commercial De-stratification Fans (New Construction/Retrofit)
- Commercial High Efficiency Condensing Furnace (New Construction/ Time of Natural Replacement)
- Commercial Heat Recovery Ventilator (New Construction/Retrofit)
- Commercial Energy Recovery Ventilator (New Construction/Retrofit)
- Commercial Heat Recovery Ventilator (50% effectiveness baseline)
- Commercial Energy Recovery Ventilator (50% effectiveness baseline)
- Residential Heat Reflector Panels
- Commercial Multi-Residential Showerhead
- Measure Assumptions reviewed and endorsed subsequent to the 2015 Update:
 - Residential High Efficiency Water Heaters (New Construction)
 - Residential Pipe Wrap (Retrofit)
 - Residential Low Flow Faucet Aerators (Retrofit)
 - Commercial Ozone Laundry (New Construction/Retrofit)
 - Commercial High Efficiency Under-Fired Broiler (New Construction/Time of Natural Replacement)
 - Commercial ENERGY STAR Convection Oven (New Construction/Time of Natural Replacement)
 - Commercial ENERGY STAR Dishwasher (New Construction/Time of Natural Replacement)
 - Commercial ENERGY STAR Fryer (New Construction/Time of Natural Replacement)
 - Commercial ENERGY STAR Steam Cooker (New Construction/Time of Natural Replacement)
 - Commercial Demand Control Ventilation New Construction/Time of Natural Replacement)
 - Commercial Demand Control Ventilation (Retrofit)

The application contains the following exhibits:

Exhibit A, Tab 1, Schedule 1 Table of Contents

Exhibit B, Tab 1, Schedule 1 Background and Introduction

Exhibit B, Tab 1, Schedule 2 Updated Summary Table of Measure Assumptions

Exhibit B, Tab 1, Schedule 3 TRM Front Section

Exhibit B, Tab 1, Schedule 4 TRM Common Assumptions Table

Exhibit B, Tab 1, Schedule 5 TRM Glossary

Exhibit B, Tab 1, Schedule 6 New and Updated Substantiation Documents

As this Application has been filed jointly, please direct correspondence to the following representatives of the Utilities:

Ms. Kirsten Walli
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Enbridge and Union respectfully request the Board's approval of the new and updated DSM measures and the TRM.

Sincerely,

(Original Signed)

Kevin Culbert
Manager, Regulatory & Policy Strategy

c.c: Dennis M. O'Leary (Aird & Berlis)
Crawford Smith (Torys)
Vanessa Innis (Union Gas)
EB-2015-0029/EB-2015-0049 Intervenors

TEC Members:

Ted Kesik – Independent Member
Bob Wirtshafter – Independent Member
Jay Shepherd – School Energy Coalition
Julie Girvan – Consumers Council of Canada
Chris Neme – Green Energy Coalition
Deborah Bullock – Enbridge Gas Distribution
Tina Nicholson – Union Gas