



May 2, 2011

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Dear Board Members:

Re: Demand Side Management (“DSM”) Guidelines for Natural Gas Utilities (EB-2008-0346)

As you consider the continuation of the gas utilities’ rate-based DSM programs, CivicAction would like to express its support for programs like this, which fill a current market gap in energy conservation.

Through our Greening Greater Toronto initiative, described below, we work closely with the owners of over 40 percent of the Greater Toronto region’s commercial office building stock and with tenants occupying almost 40 million square feet of commercial space to accelerate greater energy efficiency in their buildings. From this front-line perspective, we see the continued need for a mixed market approach to encouraging energy conservation.

The gas utilities’ DSM programs have played a significant role in advancing awareness of the environmental and economic benefits of gas conservation and in supporting organizations as they begin to implement conservation initiatives. As a result, the private sector has begun to develop business models that may well be able to eventually supplant the need for public-funded incentive programs.

Our experience tells us that the private sector models are not yet far enough advanced to be fully relied upon, and there continues to be a need to deepen and broaden awareness of the benefits and tools available to reduce energy demand. Abandoning or reducing the DSM programs risks losing the growing momentum in energy conservation. We believe that continuing, and even enhancing, the current DSM programs will continue the drive to reduce our dependence on fossil fuels, reduce our carbon emissions, and improve the quality of air we breathe.

Thank you for your consideration.

Best regards,

A handwritten signature in black ink that reads "Julia Deans".

Julia Deans, CEO

Greening Greater Toronto is an initiative of the Greater Toronto CivicAction Alliance, a multi-sectoral coalition of thousands of civic leaders committed to acting collectively to tackle tough issues and big opportunities facing the Toronto region. More than 200 corporate, government, and non-profit partners have joined Greening Greater Toronto. They and hundreds of others are engaged in programs to address the region's environmental challenges including: driving commercial building energy efficiency; investing in community emission reduction projects; and encouraging green procurement.

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