

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

April 22, 2022

**Re: EB-2021-0002 Enbridge Multi-Year Demand Side Management Plan  
Pollution Probe Letter of Comment**

Dear Ms. Marconi:

Pollution Probe is in receipt of the letter from Environmental Defence dated April 21, 2022 and the response letter from Enbridge dated April 22, 2022. Pollution Probe has also had an opportunity to review the Enbridge DSM posting and the testimony provided by Enbridge, including the transcript references provided by Enbridge. Although not directly confirmed in the Enbridge letter, it appears that Enbridge is confirming that the Senior Advisor, Municipal Energy Solutions position is one that is funded through DSM.

The DSM funded job posting for Senior Advisor, Municipal Energy Solutions includes requirements that are in conflict with the testimony provided by Enbridge's witnesses. Currently, DSM funding is not intended to maintain natural gas usage and in fact is the very opposite which is to reduce natural gas use. Enbridge has non-DSM budgets that would need to be used if they intended to promote natural gas or related add load technologies.

The transcripts suggest that Enbridge would only use DSM funds to decrease natural gas use. Enbridge needs to be transparent if it intends to use DSM funding, programs or positions to maintain or increase natural gas use. Enbridge's testimony also suggested that Enbridge wants to assist municipalities to achieve their municipal energy and emission plan goals (i.e. net zero emission goals) where the Enbridge posting suggests that Enbridge would participate in municipal energy and emission activities to mitigate the threat of reduced natural gas use.

Pollution Probe has heard from municipal stakeholders that are very concerned about working with Enbridge if the OEB allows DSM funding to be used to undermine municipal plans or for any other activities than reducing natural gas.

This appears to be a unique circumstance where the facts contradict sworn testimony and it is important to ensure that submissions and decisions are based on facts rather than fiction. As the OEB knows, Pollution Probe is a strong supporter of the synergies that DSM can bring in helping Ontario municipalities reduce natural gas use and achieve net zero goals. It will be very difficult to rebuild the

trust with municipalities to meet the OEB's partnership mandate if DSM funding can be used to undermine municipal activities or support natural gas retention.

Respectfully submitted on behalf of Pollution Probe.



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