

# Elson Advocacy

March 22, 2024

**Nancy Marconi**  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, Ontario  
M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas 2022-2027 Demand Side Management Plan  
EB-2021-0002**

I am writing on behalf of Environmental Defence further to the decision regarding the 2022-2027 Enbridge Gas Demand Side Management Plan (EB-2021-0002).

The decision required Enbridge to seek approval from the OEB Panel for any changes greater than 20% in incentive levels for its residential demand side management program.<sup>1</sup> This program was delivered in conjunction with incentives from the federal Greener Homes Grant. As many are aware, the Greener Homes Grant has been more successful than expected and therefore has expended its initial funding. We have been told that Enbridge has responded by completely suspending entry into its program. As this constitutes a decline in the approved incentives by more than 20%, it would seem to require approval from the OEB Panel. Until that approval has been granted, Enbridge is required to continue to provide the ratepayer-funded incentive amounts. In that way, customers would at least still have access to the Enbridge program incentives.

The federal government has said that it is planning a replacement of the Greener Homes Grant. However, the timelines are unclear and it is problematic that gas customers would not have access to *any* energy efficiency incentives in the interim in light of how effective those incentives are at lowering energy bills for customers.

Furthermore, we have been advised that some customers are being told that they will not receive Enbridge rebates even in cases where the customer is still eligible to receive rebates from the Greener Homes Grant. This is apparently occurring for customers who were accepted into the Greener Homes Grant but had not yet transferred in the Enbridge program. This would also appear to be contrary to the decision in EB-2021-0002.

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<sup>1</sup> EB-2021-0002, Decision and Order, November 15, 2022, p. 29.

Lastly, we understand that customers have been told that they have to wait for 6 to 8 months for a rebate cheque from Enbridge. Although we are not aware of the latest wait times, this is very concerning.

It is not clear if it is necessary for the OEB to take steps to ensure compliance with EB-2021-0002. As a first step, we propose that Enbridge provide additional details in response to this letter. By copy of this letter, we ask that Enbridge provide the following details to the OEB and the parties in this proceeding:

1. The dates and details relating to the suspension of its residential demand side management program;
2. Whether Enbridge declined to provide rebates to some customers who remain eligible for Greener Homes Grant rebates, and if so, why, and whether the issue will be resolved;
3. Whether and when Enbridge will resume providing ratepayer funded incentives approved by the OEB in EB-2021-0002, and if not, why not, and how that is compliant with the decision;
4. When Enbridge plans to propose changes to its residential program to the OEB and a timeline for implementing those changes in the market;
5. The latest update in discussions with the federal government regarding the planned replacement for the Greener Homes Grant, including on timing, measures, and potential coordination with Enbridge; and
6. The longest average wait times for Enbridge rebate cheques over the past 12 months and the most recent wait times.

Thank you for considering this matter.

Yours truly,



Kent Elson

Cc: Parties in the above proceeding