

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

April 26, 2024

**Re: EB-2021-0002 Enbridge Multi-Year Demand Side Management Plan
Pollution Probe Letter on Proposed DSM Decision/ Plan Changes**

Dear Ms. Long:

Pollution Probe is in receipt of the Enbridge letter to the OEB dated April 22, 2024 requesting OEB review and approval of changes to the 2023-2025 DSM Decision and Plan. If granted, this may result in an amendment to the OEB's EB-2021-0002 Decision.

Pollution Probe supports enhanced DSM results and in particular avoiding 'lost opportunities' by addressing opportunities that exist today and in the future. Many opportunities to achieve greater DSM results under the current OEB Decision and DSM Plan remain available. Partnering with stakeholders such as the IESO on a one-window approach does not require additional approvals and has in fact already been done in the past (e.g. Whole Home Program). The OEB EB-2021-0002 Decision provides significant flexibility in delivery of DSM and Pollution Probe has encouraged the OEB and Enbridge to look for additional opportunities to enhance DSM now, before the end of the current term.

It is unclear how the proposed changes identified by Enbridge would impact the broader 2023-2025 DSM Plan, budgets, scorecards and incentives approved by the OEB. Pollution Probe notes that Enbridge held a DSM Stakeholder Update Session on March 26, 2024, and it would have been beneficial to mention the proposed change during that consultation. If this was already presented to the OEB DSM Stakeholder Advisory Group (SAG), it would be helpful to understand what analysis the SAG has already conducted on the proposed changes.

As the OEB assesses the process to consider Enbridge's request, Pollution Probe has included some relevant elements to consider.

- What impact would the proposed changes have to various elements of the OEB approved DSM Plan, including budget, Scorecard (in each year of the plan impacted), incentives, etc.?
- The changes to the EGI-NRCan Agreement proposed by Enbridge appear to trigger the OEB requirement to file the new agreement: "To the extent that the OEB's Decision and Order results in Enbridge Gas Inc. and Natural Resources Canada making amendments to the EGI-

NRCan Agreement, Enbridge Gas Inc. shall file a copy of the Amended EGI-NRCan Agreement with the OEB within 5 business days of the execution of the Amended EGI-NRCan Agreement”.¹

- Enbridge suggests that the proposed changes will apply to existing and prospective gas customers. Even though the OEB requires DSM incentives to be offered to those either currently on natural gas or those that are planning to connect to natural gas, no DSM information or incentives are currently being offered in any of the new community expansion projects being delivered by Enbridge. How is this gap fixed given the proposed program change is directly related to opportunities for system expansion potential customers.
- Enbridge proposes changes to the ccASHP incentive. Simplicity of incentives, especially for ccASHP is important. A tiered ccASHP is more confusing to consumers than the current lump sum amount. Enbridge suggests that the TRC+ test results could be hindered unless they are able to change ccASHP incentives. Given that customer incentives do not impact the TRC+ Test (i.e. incentives are a pass-through), it appears that a change to tiered incentives rather than retaining the current single incentive would be more complicated and reduce adoption of the technology.
- IESO launched a ccASHP program in fall 2023 and expansion of this program is expected in 2024. How would the changes proposed by Enbridge integrate with the IESO offering over the DSM term?
- ccASHPs have been included in the IRP Pilot proposal. It would be less confusing and more efficient if a single incentive approach (combined with IESO) could be leveraged for both DSM and IRP. Leaving the current DSM incentive for that measure in place until a coordinated approach is OEB approved would avoid multiple changes impacting consumers, delivery agents and related stakeholders.

Respectfully submitted on behalf of Pollution Probe.



Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

cc: Enbridge (email via EGIRegulatoryProceedings@enbridge.com)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

¹ EB-2021-0002 Dec_Order_EGI_DSM Plan_20221115_signed, Page 94.