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January 28, 2025

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

Dear Ms. Marconi,

**RE: EB-2024-0198 Enbridge Gas DSM Application Intervenor Status Requests
Response of Energy Probe**

In its letter of January 21 regarding intervenor status, Enbridge raised certain questions about Energy Probe. This letter is the response of Energy Probe.

On page 8 of its letter Enbridge asks the following question.

“While EP and PP have participated in numerous previous OEB proceedings as stand-alone intervenors, the Company submits that their governance structures are not clear from the recent intervention filings. It is also not clear what are the interests of the specific parties that are allegedly represented and who such parties are. More precisely, it is not clear how EP and PP represent the direct interest of consumers and how those consumers provide input to EP’s and PP’s consultants that appear at OEB proceedings and make submissions.”

Energy Probe’s governance structure is explained in its annual filing which can be seen on the OEB website. <https://www.rds.oeb.ca/CMWebDrawer/Record/880331/File/document>

The annual filing also explains the beliefs of Energy Probe and its supporters, many of whom are gas consumers. EP’s consultants obtain instructions from the management and directors of Energy Probe who are listed in the headliner of this letter. More about Energy Probe can be found on its website <https://ep.probeinternational.org/about/>

Very few gas consumers benefit from Enbridge’s DSM programs, but all are forced to pay for them. Energy Probe believes that Enbridge’s proposed DSM plans are very costly and of little or no value to most gas consumers. The consumers who share this belief contact Energy Probe

Energy Probe Research Foundation 417 Bloor Street West, Suite 202, Toronto, Ontario, M5S 1X6

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management. and management provides instructions to consultants who represent Energy Probe in OEB proceedings.

Energy Probe has been involved in numerous OEB proceedings since the 1980's, many involving Enbridge Gas predecessor companies: Consumers Gas, Union Gas, Northern and Central Gas, Centra Gas, Enbridge Consumers Gas, and Enbridge Gas Distribution. There were never any questions about what Energy Probe stands for or its governance. In past proceedings Energy Probe has often supported Enbridge, most recently in the EB-2024-0200 Enbridge St Laurent Pipeline replacement. Energy Probe wonders why Enbridge would now object to its intervention in this proceeding unless it is because Energy Probe expressed opposition to Enbridge's DSM plans at the DSM stakeholder meetings last year.

Energy Probe represents the direct interests of many gas consumers who are opposed to Enbridge's DSM plans. If the OEB denies Energy Probe's intervention in this proceeding it will be denying their right to be heard.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe)
Regulatory Proceedings (Enbridge Gas)