

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

January 28, 2025

**EB-2024-0198 – Enbridge 2026-2030 DSM Application**  
**Pollution Probe Letter of Comment**

Dear Ms. Marconi:

Pollution Probe is in receipt of Enbridge's letter dated January 21, 2025 pertaining to Intervenor requests for the recently filed 2026-2030 Demand Side Management (DSM) Plan. Enbridge's application includes a request for approval to spend over \$1.6 billion<sup>1</sup> (excluding additional DSMVA spending) over the 2026-2030 period. Even more importantly, the new DSM Plan is required to update the DSM portfolio of programs and benefits in line with current and modern requirements and better meet the needs of Ontario's consumers and communities.

Pollution Probe has been an active and valuable participant in DSM proceedings including EB-2021-0002 which set requirement for Enbridge when filing this 2026-2030 DSM Plan. The OEB's previous DSM Decision<sup>2</sup> directed Enbridge to enhance the 2026-2030 DSM Plan to provide enhanced cost-effective DSM results, including better coordination and partnership with stakeholders<sup>3</sup>. This is one of the consumer and policy objectives that Pollution Probe recommended<sup>4</sup> and was adopted by the OEB. It should be no surprise that there is a wide range of consumer and policy interest for such a significant application. The process and results will have significant material impacts for ratepayers and communities across Ontario during the plan term and beyond<sup>5</sup>.

The letter submitted by Enbridge appears to a broad-based attempt to limit valid and essential interested party participation through the open and transparent OEB proceeding process. Enbridge seems to suggest that the public interest would be better served by an immediate and stark restriction and consolidation of intervening parties. Pollution Probe agrees with efficient and responsible participation which enhances ratepayer and policy interests and net benefits. However, Enbridge's

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<sup>1</sup> Proposed budgets per EB-2024-0198 Exhibit F, Tab 1, Schedule 2.

<sup>2</sup> EB-2021-0002.

<sup>3</sup> Including program delivery agents (e.g. IESO), local interest groups and municipalities which already have energy and emission plans that could be efficiently integrated.

<sup>4</sup> This recommendation was a recurring item identified in the consumer and community sessions held by Pollution Probe.

<sup>5</sup> The OEB EB-2021-0002 Decision reinforced the importance of increasing cost-effective DSM results into the future in alignment with ratepayer benefits and Provincial policy. This need has been even more recently reinforced through Provincial policy, directives and mandate letters.

suggestions would in fact reduce the ability for consumer and policy interests to be represented in the proceeding and reduce the value to the OEB by limiting the contribution of these diverse parties.

Although Enbridge's letter is primarily focused on other specific stakeholders or restriction of Intervenor participation in a broader sense, the letter does suggest that the OEB should require the combination of interventions by Environmental Defence (ED), the Green Energy Coalition (GEC) and Pollution Probe. Pollution Probe disagrees with that recommendation and even though Pollution Probe has noted in its intervention request that it intends to coordinate with participating stakeholders (similar to previous proceedings including EB-2021-0002), there are distinct and critical differences between Pollution Probe and the stakeholders identified by Enbridge that would make a forced consolidation artificial, inefficient and reduce overall value to the OEB in this proceeding.

Pollution Probe notes that the comments submitted by ED-GEC<sup>6</sup> appear to appropriately address Enbridge's issues related to consolidation for ED, GEC and Pollution Probe. The OEB has previously rejected Enbridge's suggestion for consolidation of interventions by ED and GEC and this premise applies even more directly for Pollution Probe. Although there has been responsible and valuable collaboration, there is a well documented difference of focus, approach and recommendations between Pollution Probe, ED and GEC, including different constituents, partners and governance. Pollution Probe is aware of its responsibility to effectively coordinate with other participating stakeholders and intends to continue that approach in this proceeding. Pollution Probe also agrees with the OEB's previous determination that the appropriate time to assess specific contributions is at the costs claim stage.

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](mailto:Michael.brophy@rogers.com)

Cc: Enbridge Regulatory (via email)  
Richard Carlson, Pollution Probe (via email)

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<sup>6</sup> ED-GEC\_LtrIntObjResponse\_20250127.