

Dennis M. O'Leary Direct: 416.865.4711 E-mail:doleary@airdberlis.com

February 18, 2025

VIA EMAIL AND RESS

Nancy Marconi

Registrar Ontario Energy Board 2300 Yonge Street, Suite 2700 Toronto, ON M4P 1E4

Dear Ms. Marconi:

Re: 2026-2030 DSM Plan Application – Late Intervention Request

Response of Enbridge Gas Inc. ("Enbridge Gas" or the "Company")

EB-2024-0198

This letter is the response of Enbridge Gas to the late intervention request filed by the Federation of Rental-housing Providers of Ontario ("**FRPO**") dated February 13, 2025.

Enbridge Gas recommends that the OEB consider the reasonableness of FRPO's nearly onemonth late intervention request when determining whether to approve the request at all. Furthermore, if accommodating FRPO's late intervention request delays the procedural timelines in any way, including the issuance of Procedural Order No. 1, Enbridge Gas submits that the late request should be denied.

In the event that the OEB accepts FRPO's late intervention request, Enbridge Gas raises some of the same concerns in respect of FRPO's intervention as were raised by the Company in its January 21, 2025 letter responding to intervention requests filed by other parties.

Enbridge Gas notes that the late intervention request by FRPO does not provide any details about its organizational or governance structure and how its consultant conveys and receives information from FRPO's members in respect of issues before the OEB. FRPO's annual intervention filing provides no details in this regard.

Consistent with Enbridge Gas's January 21, 2025 letter regarding ED, BOMA, EP, PP and CCMBC, the Company submits that it would be appropriate for the OEB to also require FRPO to provide further details and information in support of its late intervention request in accordance with the *OEB's Rules of Practice and Procedure*. More specifically, Enbridge Gas submits that FRPO should be required to provide greater details about how FRPO's members provide input to its consultant that attends OEB proceedings and makes submissions.

Timing Concerns

As noted in the Application, for the 2026 DSM program year to commence on a timely basis, Enbridge Gas is seeking a decision from the OEB by September 30, 2025. Enbridge Gas is becoming concerned about meeting the procedural milestones proposed by the Company in the Application. Enbridge Gas therefore respectfully encourages the OEB to issue Procedural Order No. 1 as soon as possible.

Yours truly

AIRD & BERLIS LLP

Dennis M. O'Leary

² Exhibit A, Tab 2, Schedule 2.



¹ Exhibit A, Tab 2, Schedule 1, p. 3.