



**Enbridge Gas Inc.**

**Application for Multi-Year Natural Gas Demand Side  
Management Plan (2026-2030)**

**PROCEDURAL ORDER NO. 1**

**March 4, 2025**

Enbridge Gas Inc. (Enbridge Gas) filed a multi-year natural gas demand side management (DSM) plan application with the Ontario Energy Board (OEB) on November 29, 2024 under section 36(1) of the *Ontario Energy Board Act, 1998*, seeking approval for a new natural gas DSM policy framework effective January 1, 2026 and approval of a new multi-year DSM plan, inclusive of budgets, programs and targets, from January 1, 2026 to December 31, 2030.

**Intervention Requests**

A Notice of Hearing was issued on December 19, 2024. The following organizations applied for intervenor status:<sup>1</sup>

- Building Owners and Managers Association (BOMA)\*
- Canadian Manufacturers & Exporters (CME)\*
- Coalition of Concerned Manufacturers and Businesses of Canada (CCMBC)\*
- Consumers Council of Canada (CCC)\*
- Energy Probe Research Foundation (Energy Probe)\*
- Environmental Defence\*
- Federation of Rental-housing Providers of Ontario (FRPO)\*
- Green Energy Coalition (GEC)\*
- Housing Services Corporation (HSC)
- Independent Electricity System Operator (IESO)
- Industrial Gas Users Association (IGUA)\*
- Low-Income Energy Network (LIEN)\*
- Minogi Corp.\*
- Ontario Greenhouse Vegetable Growers (OGVG)\*
- Pollution Probe\*
- School Energy Coalition (SEC)\*

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<sup>1</sup> Organizations marked with \* denotes a request for cost eligibility

- Small Business Utility Alliance (SBUA)\*
- Three Fires Group Inc. (TFG)\*
- Vulnerable Energy Consumers Coalition (VECC)\*

On January 21, 2025, Enbridge Gas filed a letter in response to the requests for intervenor status. Enbridge Gas argued that the OEB should i) deny the intervention request of SBUA; ii) require that certain groups that represent very similar interests combine their interventions into one, in order to reduce hearing time and cost claims; and iii) require certain groups to provide further details and information in respect of their intervention requests in accordance with the OEB's [Practice Direction on Cost Awards](#).

Various organizations that had applied for intervenor status replied to Enbridge Gas's January 21, 2025, letter with supplemental information and responses to Enbridge Gas's proposal to combine certain interventions. Generally, the proposed intervenors opposed the combining of their intervention requests, as further described below.

Both the OEB's [Report Back to the Minister on Intervenors and Regulatory Efficiency](#) (Report) and the Minister of Energy and Electrification's December 19, 2024 [Letter of Direction](#) promote a focus on regulatory efficiency and effectiveness. The OEB's Report concludes that aside from some targeted adjustments, the OEB's intervenor framework is functioning well. Regular intervention by expert intervenors can and does support positive outcomes. The report lays out a 10-point action plan to improve the OEB's adjudicative process, reduce regulatory burden and duplication in appropriate areas, and lower costs. Item number three of the action plan describes how the OEB plans to establish categories for intervenors that typically have a substantial interest in proceedings. The Report describes that intervenors would be required to work together to limit costs and reduce duplication. The Report explains that intervenors will be expected to coordinate interrogatories and cross examinations, but each intervenor will still be permitted to submit their own argument at the conclusion of a hearing. The Report goes on to say that at the end of a proceeding, these intervenors will be expected to report on how they coordinated their efforts, and intervenors' cost awards could be limited to the equivalent of one intervenor for each category.

Although the intentions of the OEB are clear, the OEB has not yet had the opportunity to engage stakeholders on implementation details of categorizing intervenors, as described in the Report. Despite this, there is a strong desire to avoid duplication and enhance efficiency, and this proceeding provides an opportunity to pilot the new approach, given the many groups interested in participating. As such, the OEB will implement the idea of intervenor categorization to some extent in this proceeding, as further described below. OEB staff will seek feedback from parties at the conclusion of the proceeding. Even those intervenors that are not categorized by interest and grouped

together are expected to coordinate and collaborate with other intervenors where possible, as has long been the expectation of the OEB and the practice by intervenors. The OEB recognizes that intervenors often already work together and coordinate their efforts.

To be clear, the categorization of intervenors is with a view towards process efficiency and will be considered when assessing and awarding costs. All intervenors that applied to intervene in this application have been determined to have a substantial interest and are accepted.

The OEB is, however, requesting additional coordination from intervenors that represent similar interests and are grouped together. The OEB expects that intervenors asked to work together will:

- Coordinate and combine interrogatories into a single set of questions in order to avoid duplication. Note that whether a question is being asked by one or all of the grouped parties can be indicated, if desired.
- Coordinate questions at the technical conference and oral hearing by having one representative from the combined group take the lead on questioning for each issue, to the extent possible.
- Coordinate the filing of any expert evidence.

The OEB will still allow all parties to file separate final submissions on this application, if desired. The OEB understands that even though parties may represent similar interests, each party's policy positions or suggested approaches for resolving concerns may be different. If the requested coordination is not possible for any reason, the OEB expects that parties will provide an explanation at the cost award stage. The OEB will consider the extent of collaboration when assessing cost claims at the conclusion of the proceeding.

### **CME and CCMBC**

In its January 21, 2025, letter, Enbridge Gas questioned whether the interests of CCMBC and CME overlap as each of these entities represent businesses. Enbridge Gas suggested that further explanation of the differences between CCMBC and CME be provided, such that a determination could be made as to whether separate representation and ratepayer funding is needed, and whether any different views are already expressed by intervenors. Enbridge Gas also submitted that CCMBC's governance structure is not clear from recent intervention filings and that more complete information should be required.

On January 28, 2025, both CCMBC and CME responded to Enbridge Gas's letter, arguing that the interests and viewpoints represented by the two groups differ and that

joining the interventions is not in the public interest. CCMBC also pointed to their annual intervenor form for more information on their governance structure.

CME stated in its January 28, 2025, letter that it represents small to medium sized businesses, specifically in the manufacturing and related sectors. CCMBC represents more than 400 manufacturers and businesses, according to its letter. CME's letter explains that the organizations that founded CCMBC were former CME members who felt that CME did not represent their voice and their views. CME's letter goes on to say that CCMBC and CME are not likely to share a common view with respect to the best solutions to address energy issues and it points to the 2023 pre-budget submissions to the Ontario Government on energy and climate change as examples of their different perspectives.

The OEB finds that CCMBC and CME's interventions should be coordinated, as described above, because both represent the interests of manufacturers and other businesses. The OEB notes that there are inherently different views amongst other categories of interests as well, but representatives of these customers must work to pull together and express common viewpoints. The OEB is of the view that allowing both entities the ability to provide separate submissions should address concerns about different proposed solutions to issues. To the extent that CCMBC and CME find that they are unable to coordinate their interrogatory requests and participation at the technical conference and oral hearing, they are free to provide an explanation at the cost award stage. The OEB also reminds CCMBC and CME that the combining of groups with similar interests is for process efficiency and will be considered at the cost award stage and there have been no limitations placed on CCMBC and CME in terms of their intervention in the proceeding. The OEB agrees that both groups have a substantial interest in the outcome of this proceeding.

The OEB also requests that CCMBC update its 2025 frequent intervenor form to provide further clarity on how its consultants participating in OEB proceedings receive direction from the Board of Directors and Management Team, including the frequency of this direction. The OEB would also appreciate a list of the current Board of Directors, management team and member organizations.

## **SBUA**

Enbridge Gas argued in its January 21, 2025, letter that SBUA should not be granted intervenor status due to concerns about SBUA's governance structure and actual existence in Canada, as well as its lack of participation in DSM-related consultation sessions. Enbridge Gas went on to state that should SBUA be granted intervenor status, its intervention should be combined with CCMBC and CME.

SBUA's January 27, 2025, reply letter provided information about its membership, activities, and mandate, and argued that intervention in this proceeding should not be predicated on participation in DSM-related consultation sessions. SBUA explained that they were experiencing a change in counsel at the time of the DSM pre-consultation. SBUA also explained that the vast majority of their members are retail and food establishments employing less than 20 people and therefore diverge significantly from the manufacturers and other commercial actors represented by CCMBC and CME. CME bolstered SBUA's argument by stating in their January 28, 2025, letter that CME's constituents are not the same as SBUA's.

The OEB is satisfied that SBUA represents a number of small business ratepayers and has a substantial interest in the outcome of this proceeding. SBUA has confirmed that its legal counsel receives direction from a steering committee, however, when filing its 2025 frequent intervenor form with the OEB, SBUA should provide more information about the frequency of this direction and an updated list of steering committee members and member organizations.

Given differences between the customers represented by SBUA and CCMBC / CME and the nature of this proceeding, the OEB will not require these three groups to coordinate their interventions at this time. However, SBUA is reminded to coordinate and collaborate with other intervenors to the fullest extent possible.

### **ED, GEC, and Pollution Probe**

In its January 21, 2025, letter, Enbridge Gas submitted that ED, GEC and Pollution Probe's interventions should be combined. Enbridge Gas states that the approaches taken by these intervenors throughout several recent OEB proceedings are largely consistent and indistinguishable from each other. Enbridge Gas also raised concerns about ED not providing a complete description of its mandate, objectives and the programs/activities it carries out. Specifically, Enbridge Gas states that ED does not indicate that its interests include the promotion of non-natural gas alternatives such as electric heat pumps. Enbridge Gas also submitted that Pollution Probe's governance structure is not clear from recent intervention filings and that more complete information should be required.

ED and GEC filed a joint response to Enbridge Gas's letter on January 27, 2025, submitting that the OEB should take the same approach as in past proceedings by permitting separate interventions and then assessing contributions at the cost claim stage. In ED and GEC's view, requiring combined interventions will result in a significant loss of important perspectives and expertise to the OEB. ED also explained its interest with respect to non-natural gas alternatives, including heat pumps.

Pollution Probe filed a response to Enbridge Gas's letter on January 28, 2025, stating that it disagrees with Enbridge Gas's recommendation and that distinct and critical differences between Pollution Probe and the stakeholders identified by Enbridge Gas would make a forced consolidation artificial, inefficient and reduce overall value to the OEB in this proceeding.

In considering the intervention requests of ED, GEC and Pollution Probe, the OEB finds that all three groups represent a policy interest relevant to the OEB's mandate and therefore have a substantial interest in this proceeding. All three groups have indicated that they intend to pursue environmental-related issues, including the use of non-natural gas alternatives, and as such, the interventions of ED, GEC, and Pollution Probe should be coordinated for the purposes of process efficiency and will be considered at the cost award stage, as described above. The OEB is of the view that allowing for separate submissions should address concerns that different groups may recommend different approaches to issues. The OEB commends ED and GEC for already intending to coordinate any expert evidence permitted and is hopeful that having counsel at the same firm should increase the opportunity for efficiency.

In addition, the OEB requests that Pollution Probe update its 2025 frequent intervenor form to provide further clarity on how its consultant participating in OEB proceedings receives direction from the Director of Energy Policy, President and CEO, including the frequency of this direction.

### **LIEN and VECC**

Enbridge Gas's January 21, 2025, letter suggests that the interventions of LIEN and VECC be combined as there appears to be a significant degree of overlap in that they both represent the interests of low-income vulnerable ratepayers.

On January 28, 2025, LIEN provided a response to Enbridge Gas's suggestion. LIEN stated that LIEN and VECC have very different objectives and members. While LIEN and VECC share an interest in the protection of low-income consumers, VECC's constituents include other vulnerable customer groups such as seniors. VECC filed a letter on January 29, 2025, confirming its agreement with the comments filed by LIEN.

The OEB finds that given the interests represented by LIEN and VECC, both have a substantial interest in the proceeding and that the interventions of LIEN and VECC should be coordinated for the purposes of process efficiency and will be considered at the cost award stage. The customers represented by LIEN are a subset of the vulnerable customers represented by VECC.

## Minogi and Three Fires

Enbridge Gas's January 21, 2025, letter suggested that the OEB consider the appropriateness of combining the interventions of Minogi and Three Fires.

On January 28, 2025, Minogi and Three Fires confirmed that they are open to coordinating their interventions on the same basis as in two previous OEB proceedings, and in fact that their intervention request stated their intention to closely coordinate their participation.

The OEB finds that both Minogi and Three Fires have a substantial interest in this proceeding and that the coordination already planned by Minogi and Three Fires is consistent with that being requested of other intervenors. The OEB commends Minogi and Three Fires on their willingness to support regulatory efficiency and reduce costs where possible.

## IGUA and OGVG

IGUA states in its intervention form that its members are large volume customers. OGVG's intervention form states that its members are large consumers of natural gas. The OEB finds that IGUA and OGVG have a substantial interest in the proceeding. The OEB also notes that they both appear to represent the interests of large consumers of natural gas and, as such, the OEB is considering coordinating their participation in this proceeding in the same manner as other groups are being asked to do so. The OEB is aware that Enbridge Gas did not suggest the combination of IGUA and OGVG in its January 21, 2025, letter, and as such, IGUA and OGVG have not had an opportunity to provide any comments on the proposed coordination of their intervention requests. Although the OEB sees a potential benefit to coordinating efforts between IGUA and OGVG based on the current information on the record of the proceeding, the OEB will allow IGUA and OGVG the opportunity to provide a response to this proposal by **March 10, 2025** before making a final decision.

## FRPO and HSC

Enbridge Gas's February 18, 2025, letter recommended denying FRPO's late intervention request if it was to in any way delay procedural timelines. Enbridge Gas also stated that FRPO should be required to provide further details about how FRPO's members provide input to its consultant.

On February 18, 2025, FRPO provided further information regarding its late intervention request and its governance structure.

FRPO stated in its intervention request that it is Ontario's leading advocate for quality rental housing, representing over 800 private owners and managers who supply over 350,000 rental suites across the province. HSC's intervention form stated that it represents Ontario's community (social) housing sector, which is comprised of approximately 1,400 community housing providers and 47 municipal service managers and district social services administration boards across approximately 250,000 housing units. The OEB finds that FRPO and HSC have a substantial interest in the proceeding. The OEB also notes that they both appear to represent the interests of the housing sector, and, as such, the OEB is considering coordinating their participation in this proceeding in the same manner as other groups are being asked to do so. The OEB is aware that Enbridge Gas did not suggest the combination of FRPO and HSC, and as such FRPO and HSC have not had an opportunity to provide any comments on the proposed coordination of their intervention requests. Although the OEB sees a potential benefit to coordinating efforts between FRPO and HSC based on the current information on the record of the proceeding, the OEB will allow FRPO and HSC the opportunity to provide a response to this proposal by **March 10, 2025** before making a final decision.

The OEB has reviewed the information included in FRPO's annual filing and provided in its February 18, 2025 letter and is satisfied that FRPO has explained how its consultant, participating in OEB proceedings, receives direction from the President and CEO. Further information on the frequency of this direction would, however, be helpful in an update to FRPO's 2025 frequent intervenor form.

## **BOMA**

Enbridge Gas suggested in its January 21, 2025 letter that BOMA should be required to provide a more complete description of the programs and activities it carries out in an updated intervenor status request. On January 28, 2025, BOMA filed a letter which provided details of its governance structure and the commercial and financial interests of its representatives. The OEB is satisfied that the information provided by BOMA illustrates that its consultant, Enerlife, meets regularly and takes direction from BOMA Toronto senior management and that BOMA has a substantial interest in the outcome of this proceeding. The OEB cautions BOMA's representative, Enerlife, that to the extent it is advocating for its own financial interests, cost awards may be limited.

## **EP**

Enbridge Gas submitted in their January 21, 2025 letter that EP's governance structure is not clear from recent intervention filings and that more complete information should be required. EP's letter of January 28, 2025 stated that its governance structure is explained in its annual filing. The OEB has reviewed the information included in EP's



annual filing and is satisfied that EP has explained the structure of EP and how its consultant, participating in OEB proceedings, receives direction from the Board of Directors and Management Team.

All requests for intervenor status are approved. Parties that additionally requested cost awards are eligible to apply for an award of costs under the OEB's Practice Direction on Cost Awards. The list of parties in this proceeding is attached as Schedule A to this Procedural Order.

Cost eligible intervenors should be aware that the OEB will not generally allow the recovery of costs for the attendance of more than one representative of any party unless a compelling reason is provided when cost claims are filed.

Being eligible to apply for recovery of costs is not a guarantee of recovery of any costs claimed. Cost awards are made by way of OEB order at the end of a hearing.

### **Issues List**

OEB staff has prepared a draft Issues List which is attached as Schedule B to this Procedural Order. The OEB will use a two-stage process to seek input. Enbridge Gas and intervenors are invited to file written submissions on the Draft Issues List. Following these submissions, all parties (including Enbridge Gas and OEB staff) will have an opportunity to provide additional comments regarding the submissions of other parties. After reviewing these submissions, the OEB will issue a final issues list. Only matters that are on the final issues list will be considered in this proceeding.

### **Interrogatories**

At this time, provision is being made for written interrogatories. In preparing interrogatories, parties should refer to the OEB's approved Issues List. Parties should consult Rules 26 and 27 of the OEB's [Rules of Practice and Procedure](#) regarding required naming and numbering conventions and other matters related to interrogatories. Parties should not engage in detailed exploration of items that do not appear to be material. In making its decision on cost awards, the OEB will consider whether intervenors made reasonable efforts to ensure that their participation in the hearing was focused on material issues.

### **Expert Evidence**

Any intervenor wishing to file evidence in this proceeding should request leave to file such evidence with the OEB in accordance with the timelines set out below. Rule 13.04 of the OEB's *Rules of Practice and Procedure* sets out what information should be included when making such a request.

Any experts will be expected to acknowledge their duties in the proceeding by filing [Form A](#) pursuant to Rule 13A.03(f) of the OEB's *Rules of Practice and Procedure*.

The OEB has also set out dates for parties to file written interrogatories on expert evidence in this proceeding.

### Technical Conference

A transcribed technical conference will be held to provide clarification on interrogatory responses. In preparation for the technical conference, the OEB will require parties to file a description of the specific areas that they will be focusing on and an estimate of the time required for each area of focus. This will allow a technical conference schedule to be developed. If parties wish to file specific questions in advance, they may do so.

The technical conference will be held on **May 29-30, 2025** and will continue on **June 2, 2025**, if necessary. Responses to undertakings from the technical conference shall be filed with the OEB by **June 5, 2025**.

### Settlement Conference

A settlement conference among the parties and OEB staff will be convened on **June 9-10, 2025** starting at 9:30 a.m. If necessary, the settlement conference will continue on **June 11, 2025**. This will be a virtual event and information on participating will be provided before the conference. OEB staff or intervenors who intend to submit clarification questions to Enbridge Gas as part of the settlement process are encouraged to submit any questions in advance of the settlement conference.

### Oral Hearing and Submissions

Based on the schedule outlined above, the OEB anticipates that a hybrid oral hearing on any unsettled issues would take place in late-July to early-August. Parties are expected to reserve this time should it be required. Similarly, written submissions from parties, including Argument-in-Chief from Enbridge Gas and final arguments from parties, would be expected to be scheduled for late-August to early-September.

The OEB is making provision for the following related to this proceeding. Further procedural orders may be issued by the OEB.

### THE ONTARIO ENERGY BOARD ORDERS THAT:

1. IGUA and OGVG may file reply comments on the potential coordination of their intervention with the OEB and serve them on all parties by **March 10, 2025**.

2. FRPO and HSC may file reply comments on the potential coordination of their intervention with the OEB and serve them on all parties by **March 10, 2025**.

### **Draft Issues List**

3. Enbridge Gas and intervenors may file written submissions on the draft issues list, attached as Schedule B to this Procedural Order, with the OEB and serve them on all other parties by **March 7, 2025**.
4. Enbridge Gas, OEB staff and intervenors may file any additional comments on the Draft Issues List, in reply to the submissions of other parties, with the OEB and serve them on all other parties by **March 13, 2025**.

### **Interrogatories**

5. Intervenors and OEB staff shall request any relevant information and documentation from Enbridge Gas that is in addition to the evidence already filed, by written interrogatories filed with the OEB and served on all other parties on or before **March 27, 2025**.
6. Enbridge Gas shall file with the OEB, copying all other parties, complete written responses to all interrogatories by **April 15, 2025**.

### **Expert Evidence**

7. Any intervenors seeking to file evidence in this proceeding shall write to the OEB for leave to do so by **March 26, 2025**.
8. Enbridge Gas shall file with the OEB, copying all other parties, any response to intervenors seeking to file evidence by **March 31, 2025**.
9. Intervenors may file a reply to any such comments from Enbridge Gas by **April 2, 2025**.
10. Any intervenors granted leave by the OEB to file evidence shall file their evidence with the OEB, copying all other parties, by **May 5, 2025**.
11. Parties requesting relevant information or material from intervenors that filed evidence shall file written interrogatories with the OEB, copying all other parties, by **May 14, 2025**.
12. Intervenors that receive interrogatories on their evidence shall file with the OEB, copying all other parties, complete responses to the interrogatories by **May 23, 2025**.

**Technical Conference**

13. The OEB is making provision for a virtual transcribed technical conference on **May 29-30, 2025**, starting at 9:30 a.m. If necessary, the technical conference will continue on **June 2, 2025**. In preparation for the technical conference, the OEB will require parties to file a description of the specific areas that they will be focusing on and an estimate of time required for each area of focus by **May 26, 2025**. This will allow a technical conference schedule to be developed. Further information on how to participate in the event will be communicated to parties closer to the date.
14. Responses to undertakings from the technical conference shall be filed with the OEB and sent to all parties by **June 5, 2025**.

**Settlement Conference**

15. A virtual settlement conference among the parties and OEB staff will be convened on **June 9-10, 2025**, starting at 9:30 a.m. If necessary, the settlement conference will continue on **June 11, 2025**. Further information on how to participate will be communicated to parties closer to the date.
16. No later than **June 13, 2025**, OEB staff shall file a letter informing the OEB of the status of the settlement discussions including whether a tentative agreement has been reached or if the parties propose to continue the settlement discussions.
17. If a settlement is reached between the parties, Enbridge Gas shall file the settlement proposal and send a copy to all intervenors by **June 27, 2025**. In addition to outlining the terms of any settlement, the settlement proposal should contain a list of any unsettled issues.
18. Any submission from OEB staff on the settlement proposal shall be filed with the OEB and sent to all parties by **July 7, 2025**.

Parties are responsible for ensuring that any documents they file with the OEB, such as applicant and intervenor evidence, interrogatories and responses to interrogatories or any other type of document, **do not include personal information** (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's [Rules of Practice and Procedure](#).

Please quote file number, **EB-2024-0198** for all materials filed and submit them in searchable/unrestricted PDF format with a digital signature through the [OEB's online filing portal](#).

- Filings should clearly state the sender's name, postal address, telephone number and e-mail address.
- Please use the document naming conventions and document submission standards outlined in the [Regulatory Electronic Submission System \(RESS\) Document Guidelines](#) found at the [File documents online page](#) on the OEB's website.
- Parties are encouraged to use RESS. Those who have not yet [set up an account](#), or require assistance using the online filing portal can contact [registrar@oeb.ca](mailto:registrar@oeb.ca) for assistance.
- Cost claims are filed through the OEB's online filing portal. Please visit the [File documents online page](#) of the OEB's website for more information. All participants shall download a copy of their submitted cost claim and serve it on all required parties as per the [Practice Direction on Cost Awards](#).

All communications should be directed to the attention of the Registrar at the address below and be received by end of business, 4:45 p.m., on the required date.

With respect to distribution lists for all electronic correspondence and materials related to this proceeding, parties must include the Case Manager, Michael Bell at [Michael.Bell@oeb.ca](mailto:Michael.Bell@oeb.ca) and OEB Counsel, Lawren Murray at [Lawren.Murray@oeb.ca](mailto:Lawren.Murray@oeb.ca).

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Tel: 1-877-632-2727 (Toll free)

**DATED** at Toronto, **March 4, 2025**

**ONTARIO ENERGY BOARD**

**By delegation, before: Nancy Marconi**

Nancy Marconi  
Registrar

**SCHEDULE A**  
**LIST OF APPLICANT AND INTERVENORS**

**Enbridge Gas Inc.**

**EB-2024-0198**

**PROCEDURAL ORDER NO. 1**

**March 4, 2025**

**Enbridge Gas Inc.  
2026-2030 Demand Side Management (DSM) Plan  
EB-2024-0198**

**APPLICANT & LIST OF INTERVENORS**

**March 4, 2025**

**APPLICANT**

**Rep. and Contact Information for Service**

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**APPLICANT & LIST OF INTERVENORS**

**March 4, 2025**

**Building Owners and  
Managers Association,  
Greater Toronto**

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**APPLICANT & LIST OF INTERVENORS**

**March 4, 2025**

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Manufacturers and  
Businesses of Canada**

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**APPLICANT & LIST OF INTERVENORS**

**March 4, 2025**

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**Federation of Rental-housing  
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**Enbridge Gas Inc.**  
**2026-2030 Demand Side Management (DSM) Plan**  
**EB-2024-0198**

**APPLICANT & LIST OF INTERVENORS**

**March 4, 2025**

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**Enbridge Gas Inc.  
2026-2030 Demand Side Management (DSM) Plan  
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**APPLICANT & LIST OF INTERVENORS**

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**SCHEDULE B**

**DRAFT ISSUES LIST**

**Enbridge Gas Inc.**

**EB-2024-0198**

**PROCEDURAL ORDER NO. 1**

**March 4, 2025**

**Draft Issues List**  
**Enbridge Gas' Multi-Year Natural Gas Demand Side Management Plan (2026-2030) Application**

**General Issues**

1. Does Enbridge Gas's 2026-2030 DSM Plan adequately support energy conservation, energy efficiency, and integrated planning in accordance with the policies of the Government of Ontario, including having regard to consumers' economic circumstances?
2. Does Enbridge Gas's 2026-2030 DSM Plan adequately respond to previous OEB direction and guidance on future DSM activities (e.g., EB-2021-0002 DSM Decision)?
3. Does Enbridge Gas's 2026-2030 DSM Plan adequately consider and reflect input from the Stakeholder Advisory Group report, the OEB's Achievable Potential Study, and that provided by parties during stakeholder sessions?
4. Is Enbridge Gas's 2026-2030 DSM plan consistent with energy conservation industry best practices in Ontario and other relevant Canadian and U.S. jurisdictions?
5. Is Enbridge Gas's proposed DSM Plan term of 2026-2030 appropriate?
6. Is Enbridge Gas's proposed inclusion of electrification/fuel switching program offerings appropriate?

**Specific Issues within Enbridge Gas' 2026-2030 DSM Application**

7. Are Enbridge Gas's proposed updates to the OEB's DSM Framework appropriate?
8. Does Enbridge Gas's proposed budget, including program costs and portfolio costs, result in reasonable rate impacts, while addressing the OEB's DSM objectives in its DSM Framework?
9. Is Enbridge Gas's proposed cost recovery approach appropriate?
  - a. Are there any other cost recovery approaches that should be included in addition to or to replace the approach proposed by Enbridge Gas?
10. Are Enbridge Gas's proposed shareholder incentives appropriate?
  - a. Is Enbridge Gas's proposed annual maximum shareholder incentive, including structure, and amount appropriate?

- b. Are there any other incentive mechanisms that should be included in addition to or to replace those proposed by Enbridge Gas?
11. Are Enbridge Gas's proposed scorecards, including performance metrics, metric weightings, and targets appropriate?
- a. Is Enbridge Gas's proposed Residential Program Scorecard, including targets and performance metrics appropriate?
  - b. Is Enbridge Gas's proposed Income Qualified Program Scorecard, including targets and performance metrics appropriate?
  - c. Is Enbridge Gas's proposed Commercial Program Scorecard, including targets and performance metrics appropriate?
  - d. Is Enbridge Gas's proposed Industrial Program Scorecard, including targets and performance metrics appropriate?
  - e. Is Enbridge Gas's proposed Large Volume Program Scorecard, including targets and performance metrics appropriate?
  - f. Should there be any other scorecards, targets and/or metrics included in addition to or to replace those proposed by Enbridge Gas?
12. Has Enbridge Gas proposed an optimal suite of program offerings that will maximize natural gas savings and provide the best value for rate payer funding?
- a. Are Enbridge Gas's proposed program offers for residential customers appropriate?
  - b. Are Enbridge Gas's proposed residential beyond building code program offerings appropriate?
  - c. Are Enbridge Gas's proposed program offerings for income qualified customers appropriate?
  - d. Are Enbridge Gas's proposed program offerings for commercial customers appropriate?
  - e. Are Enbridge Gas's proposed program offerings for industrial customers appropriate?
  - f. Are Enbridge Gas's proposed program offerings for large volume customers appropriate?

- g. Are Enbridge Gas's proposed program offerings appropriate for customers in Indigenous communities?
  - h. Should there be any other program offerings included in addition to or to replace those proposed by Enbridge Gas?
- 13. Are Enbridge Gas's proposed research and development intentions and activities appropriate?
- 14. Are Enbridge Gas's proposed changes to the evaluation, measurement and verification of natural gas savings appropriate?
  - a. Are Enbridge Gas's proposed deemed proxy net-to-gross ratios appropriate?
  - b. Is Enbridge Gas's proposal for the application of updates to deemed net-to-gross ratios appropriate?
- 15. Are Enbridge Gas's proposed updates to the treatment of input assumptions, cost-effectiveness, and avoided costs appropriate?
- 16. Is Enbridge Gas's proposed rate allocation methodology, and accounting treatment, including the function of various deferral and variance accounts appropriate?
- 17. Does Enbridge Gas's proposed 2026-2030 DSM Plan require any changes to be consistent with the direction and guidance regarding Integrated Resource Planning?
- 18. Has Enbridge Gas proposed a reasonable approach to ensure natural gas DSM programs are effectively coordinated with electricity conservation programs and other energy conservation and greenhouse gas reduction programs applicable in its service territory?
  - a. Is Enbridge Gas's proposed approach to natural gas savings attribution when coordinating or collaborating with other programs appropriate?
- 19. Is there any transition and/or implementation guidance required related to the proposed 2026-2030 DSM plan and any future DSM plan application?