



Ms. Nancy Marconi
Registrar
Ontario Energy Board
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2300 Yonge Street
Toronto, ON M4P 1E4

March 7, 2025

**EB-2024-0198 – Enbridge 2026-2030 DSM Application
Pollution Probe Submission on the Draft Issues List**

Dear Ms. Marconi:

In accordance with Procedural Order No. 1 for the above-noted proceeding, below includes Pollution Probe's submissions related to the Draft Issues List.

This Demand Side Management (DSM) proceeding relates to a multi-year DSM plan with significant costs and potential impacts, spanning a large range of impacted stakeholders and issues. Pollution Probe understands that the Draft Issues List is intended to provide a relevant list of directional issues to assist the Ontario Energy Board (OEB) and parties to the proceeding, but that each issue will enable the appropriate flexibility to cover the relevant scope related to the issues. In other words, that the Draft Issues List wording is not meant to intentionally restrict the appropriate scope related to each issue listed. On that basis, Pollution Probe believes that the Draft Issues List provides a good basis for assessing the broad set of issues relevant to this proceeding.

Similar to the comments noted above, the OEB could consider adding clarity if it is possible that Enbridge or any other stakeholder may interpret the issues wording as inherently restrictive to the consideration of the broader intent related to each issue in the Draft Issues List. For example, for Draft Issue #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?), it is logical that the issue implicitly includes what changes or additions should be made, if there are gaps or deficiencies found in the Plan filed by Enbridge. If the OEB believes that additional clarity is required, the OEB could include additional wording such as "What changes or additions are required to address any gaps or deficiencies identified?". The same approach could be considered for the other issues in the Draft Issues List since they also implicitly include what should occur if there is a gap or deficiency in the Plan is found related to those issues.

Issue 17 indicates "Does Enbridge Gas's proposed 2026-2030 DSM Plan require any changes to be consistent with the direction and guidance regarding Integrated Resource Planning?". Pollution Probe understands that this issue implicitly includes consideration of the efficient and effective coordination of DSM and Integrated Resource Planning (IRP) as intended by the OEB. If there may be confusion about the scope of this issue, the OEB could include "Does the DSM Plan ensure the efficient and effective coordination between DSM and IRP to ensure cost effective results?".

Issue 18 indicates “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?”. In the previous DSM proceeding and related Decision the OEB recognised the opportunity to more effectively leverage Ontario municipalities to increase cost-effective DSM results in coordination with municipal energy and emission plan activities. Although municipalities are implicitly included in Issue 18 as worded, the OEB may wish to explicitly note them as an example (including Ontario municipalities) in Issue 18.

Respectfully submitted on behalf of Pollution Probe.

A handwritten signature in black ink, appearing to read "Michael Brophy", is positioned above a horizontal line.

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