



March 7, 2025

VIA RESS

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

Dear Ms. Marconi,

**Re: Enbridge Gas Inc. (“EGI”)
Application for Multi-Year Natural Gas Demand Side Management Plan (2026-2030)
Board File No.: EB-2024-0198**

We are counsel to Minogi Corp. (“**MC**”) and Three Fires Group Inc. (“**TFG**”) in the above-noted proceeding (the “**Proceeding**”) and file these submissions on Board Staff’s Draft Issues List (the “**Draft Issues List**”) in accordance with Procedural Order No.1.

MC and TFG support the inclusion of draft Issue 12.g. and respectfully request that the Board ensure that the Indigenous Working Group (“**IWG**”) and Indigenous ratepayers and rightsholders have their right to be heard with a clear opportunity to provide input for EGI’s Demand Side Management (“**DSM**”) Plan and its impacts on Indigenous customers. MC and TFG request that the Board incorporate the underlined revisions to draft Issues 1 and 3 of the Draft Issues List, ensuring that the DSM Plan incorporates the views and perspectives of EGI’s Indigenous customers:

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 the economic circumstances of consumers and Indigenous communities?

Issue 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 and the Indigenous Working Group?

MC and TFG respectfully submit that the IWG represents a critical and evolving forum for informed Indigenous engagement in the development of EGI’s DSM Plan and programming. For example, “[DSM] programs for Indigenous communities and customers served by Enbridge Gas” is one of

the focus areas of the approved settlement agreement establishing the IWG in Phase 1 of EGI's 2024 rebasing application (EB-2022-0200). Ensuring meaningful consultation with the IWG, as well as understanding the unique economic and energy circumstances of EGI's Indigenous customers, is essential to embedding Indigenous perspectives into EGI's DSM Plan and DSM engagement approach. MC and TFG therefore request that the Board incorporate the proposed additions to draft issues 1 and 3 into the final Issues List for this Proceeding, ensuring that Indigenous perspectives, inputs, and recommendations are effectively integrated into EGI's DSM Plan and DSM program development.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Vollmer", with a stylized, flowing script.

DT Vollmer, Counsel for MC and TFG

- c. Reggie George, TFG
Dr. Don Richardson, MC