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March 7, 2025

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Attention: Registrar

Dear Sir/Madam:

**Re: Low Income Energy Network and Vulnerable Energy Consumers Coalition  
Comments on Draft Issues List  
Enbridge Gas Inc. (“EGI”)  
OEB File No. EB-2024-0198 (2026-2030) Demand Side Management (“DSM”) Plan**

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Our firm is legal counsel for the Low Income Energy Network (LIEN). In accordance with Schedule B of the Procedural Order No. 1 issued March 4, 2025 in this proceeding, LIEN proposes that the following questions be included in the Issues List, unless the OEB determines that these issues are already subsumed within the existing Issues List:

- ♦ What is the status and what are the objectives and next steps regarding the ongoing collaboration between IESO and Enbridge on low-income, residential and other DSM programs?
- ♦ What is EGI's plan for stakeholder engagement on DSM plan implementation post OEB approval of a DSM plan?
- ♦ In light of the ongoing trade/tariff disputes between Canada and the United States and the likely natural gas price increase (given Ontario's reliance on natural gas from US shale sources), how will EGI address the tariff impacts on the proposed plan, including on the plan's budget, targets and programming?

Pursuant to the OEB's Procedural Order No. 1, LIEN and the Vulnerable Energy Consumers Coalition (VECC) have coordinated on the Draft Issues List and we have accordingly included VECC's comments on the Draft Issues List below:

- ♦ Issue 2: Does Enbridge Gas's 2026-2030 **DSM Framework and DSM** Plan adequately respond to previous OEB direction and guidance on future DSM activities (e.g., EB-2021-0002 DSM Decision)?

VECC believes the DSM Framework is an integral part of this issue and should be included.

- ♦ Issue 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, **including having regard to consumers' economic circumstances?**

The additional text was included in Issue 6 in EB-2021-0002 and VECC submits it is relevant in this proceeding and should be included in Issue 8.

Yours truly,

A handwritten signature in blue ink, appearing to read "Matt F. Gardner", with a long, sweeping horizontal line extending to the right.

Matt Gardner  
Partner

*Certified as a Specialist in Environmental Law  
by the Law Society of Ontario*

cc: LIEN Legal Subcommittee  
Judy Simon (consultant for LIEN)  
Shelley Grice (consultant for VECC)