

# Elson Advocacy

March 7, 2025

**Nancy Marconi**  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, Ontario  
M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas 2026-2030 Demand Side Management Plan  
EB-2024-0198**

I am writing on behalf of Environmental Defence Canada (“EDC”) and the Green Energy Coalition (“GEC”) to provide comments on the draft issues list.

## **DSM Framework**

EDC and GEC request that an amendment be made to issue 7 to clarify that Enbridge is not the only party that may propose updates to the DSM Framework. The issues list for the previous DSM proceeding included clear wording that allowed DSM Framework issues to be addressed, including the following:

1. Does Enbridge Gas’s 2023-2027 DSM Framework and DSM Plan adequately respond to previous OEB direction and guidance on future DSM activities (e.g., DSM Mid-Term Review Report, 2021 DSM Decision, OEB’s post-2021 DSM guidance letter)?
2. Does Enbridge Gas’s 2023-2027 DSM Framework and DSM Plan adequately support energy conservation and energy efficiency in accordance with the policies of the Government of Ontario, including having regard to consumers’ economic circumstances? (emphasis added)

In the equivalent issues in the draft issues list for this proceeding, the references to the DSM Framework have been removed. The draft for this proceeding reads as follows:

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)?

As a result, the only DSM Framework issue in the draft list is issue 7, but that issue is restricted to examining the specific updates proposed by Enbridge Gas. Issue 7 reads as follows in the draft list: "7.Are Enbridge Gas's proposed updates to the OEB's DSM Framework appropriate?"

We believe an amendment is warranted to clarify that Enbridge is not the only party that may propose updates to the DSM Framework. This would be consistent with the Decision and Order in the previous DSM proceeding, which stated at page 16 that "[t]he OEB will consider future updates or revisions to the DSM Framework where necessary," without limiting the ability to propose said updates to Enbridge. We believe the simplest approach would be to amend issue 7 to read as follows: "7. Is the proposed DSM Framework appropriate?" Alternatively, references to the DSM Framework could be re-inserted into issues 1 and 2.

### **Electrification**

Although EDC and GEC do not specifically request an amendment to the issues list in this regard, they question whether it is necessary to separately set out the following issue: "6. Is Enbridge Gas's proposed inclusion of electrification/fuel switching program offerings appropriate?" The appropriateness of electrification and fuel switching programming is already subsumed in a variety of other issues and need not be set out separately. For instance, it is subsumed in the four general issues regarding the DSM plan (issues 1-4) and in the program offerings issue (issue 12). It need not be separately set out in issue 6.

Furthermore, it is not clear why this issue would be separately set out on the issues list seeing as the OEB decided the matter so definitely in the recent DSM decision after extensive evidence and submissions on the topic. Some relevant excerpts from that decision are as follows:

The OEB is also of the view that the inclusion of incentives for electric heat pumps and water heaters is a major benefit for customers. This will enable them to assess the best option for their household in order to maximize efficiency improvements, reduce their natural gas bill and help avoid incremental GHG emissions. (p. 28)

The OEB finds that providing gas customers with incentives to use natural gas more efficiently through measures such as improved building insulation, or to switch away from natural gas to electricity powered solutions such as heat pumps is consistent with the DSM objectives of reducing natural gas consumption and increasing the efficiency of natural gas usage. This is also consistent with the fundamental economic principle that as demand is reduced, costs are also reduced. For energy efficiency and energy conservation programs, this means that lower overall costs due to these DSM programs may contribute to the reduction in demand for natural gas and result in lower costs for all customers. Such benefits

that may accrue to Ontario ratepayers as a result of reduced gas consumption are achieved by those programs that feature efficiency and fuel-switching measures. (p. 16)

As noted previously in this Decision and Order, the OEB is of the view that, consistent with the main objective of DSM being reductions in natural gas usage, enabling current gas customers to achieve the greatest level of energy efficiency improvements, including electrifying space and water heating appliances, provides benefits to participants and non-participants alike. (p. 25)

The OEB considered comments and recommendations from stakeholders related to including more opportunities for customers to electrify. The OEB has approved incentives for measures, such as cold climate electric heat pumps that allow existing gas customers to switch away from gas. ... The OEB's modifications will enable customers the ability to assess the best energy options for their household in order to maximize energy efficiency improvements, reduce their natural gas bill and help avoid incremental greenhouse gas emissions. (p. 3)

Although parties are free to raise the appropriateness of measures that involve fuel switching, it is not necessary for that to be set out as a separate issue.

EDC and GEC will provide any additional comments they may have on the issues list in accordance with *Procedural Order #1* in response to the comments of any other parties.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', with a stylized flourish at the end.

Kent Elson

cc: Parties in the above proceeding