

March 7, 2025

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms Marconi

EB-2024-0198 – Enbridge Gas Inc. – Multi-Year Natural Gas Demand Side Management Plan – 2026-2030

We represent the Consumers Council of Canada (Council) in the above-referenced proceeding. In its Procedural Order No. 1, dated March 4, 2025, the Ontario Energy Board (OEB) provided Enbridge Gas Inc. (Enbridge Gas) and intervenors with an opportunity to comment on the OEB Staff Draft Issues List for the proceeding. These are the submissions of the Council with respect to the Draft Issues List.

The Council is satisfied that all issues relevant to the proceeding have been included in the Draft Issues List. However, the Council is proposing a wording change with respect to Issue 14.

The issue as proposed is – *Are Enbridge Gas's proposed changes to the evaluation, measurement and verification of natural gas savings appropriate?*

The Council is proposing the following wording – *Is the proposed evaluation, measurement and verification (EMV) of natural gas savings appropriate?* This change will ensure that parties have an opportunity to consider all components of the EMV process, not just the changes proposed by Enbridge Gas. For example, the Council would like to review the free-ridership rates for Enbridge Gas's programs. We may also want to consider whether the current EMV process overall is appropriate.

Issue 18 states – *Has Enbridge Gas proposed a reasonable approach to ensure that 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?* The Council is of the view that coordination is clearly an issue for the OEB to consider. In addition, we are of the view that Enbridge Gas's overall programs and budgets should be considered light of the Government of Ontario's announcement on January 7, 2025, of its "new and expanded" energy efficiency programs, with a proposed budget of \$10.9 billion. We assume that this is covered under Issue 1 – *Does Enbridge Gas's 2026-2030 DSM Plan adequately support energy conservation, energy efficiency, and integrated resource planning in accordance with the policies of the Government of Ontario, including having regard to consumers' economic circumstances.*

Please feel free to contact me if you have any questions.

Yours truly,

Julie E. Girvan

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CC: All parties