



Ontario Energy Board | Commission de l'énergie de l'Ontario

BY EMAIL

March 13, 2025

Nancy Marconi
Registrar
Ontario Energy Board
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Dear Nancy Marconi:

**Re: Ontario Energy Board (OEB) Staff Reply Comments on the Submissions of Other Parties on Draft Issues List
Enbridge Gas Inc. – Application for Multi-Year Natural Gas Demand Side Management Plan (2026-2030)
OEB File Number: EB-2024-0198**

In accordance with Procedural Order No. 1, please find attached the OEB staff reply submission on the Draft Issues List. The attached document has been forwarded to Enbridge Gas Inc. and to all other parties to this proceeding.

Yours truly,

Michael Bell
Senior Advisor, Application Policy & Conservation

c: All parties in EB-2024-0198

Encl.



ONTARIO ENERGY BOARD

OEB Staff Reply Submission on Draft Issues List

Enbridge Gas Inc.

**Multi-Year Natural Gas Demand Side Management Plan
(2026-2030)**

EB-2024-0198

March 13, 2025

Background

Enbridge Gas Inc. (Enbridge Gas) filed a multi-year natural gas demand side management (DSM) plan application with the Ontario Energy Board (OEB) on December 2, 2024, seeking approval for a new natural gas DSM policy framework effective January 1, 2026 and approval of a new multi-year DSM plan, inclusive of budgets, programs, and targets from January 1, 2026 to December 31, 2030.

In [Procedural Order No. 1](#), issued March 4, 2025, the OEB included a draft issues list (Draft Issues List) prepared by OEB staff, and initiated a two-stage process to seek input in finalizing the issues list (Issues List). Enbridge Gas and approved intervenors were invited to file written submissions on the Draft Issues List by March 7, 2025, and all parties (including Enbridge Gas and OEB staff) were invited to file any additional comments regarding the submissions of other parties by March 13, 2025.

Enbridge Gas and the following parties made written submissions on the Draft Issues List:

- Building Owners and Managers Association (BOMA)
- Canadian Manufacturers & Exporters (CME)
- Consumers Council of Canada (CCC)
- Industrial Gas Users Association (IGUA)
- Ontario Greenhouse Vegetable Growers (OGVG)
- Pollution Probe
- School Energy Coalition (SEC)
- Small Business Utility Alliance (SBUA)

The following parties made combined written submissions on the Draft Issues List:

- Environmental Defence and Green Energy Coalition (GEC)
- Low-Income Energy Network (LIEN) and Vulnerable Energy Consumers Coalition (VECC)
- Minogi Corp. (MC) and Three Fires Group Inc. (TFG)

OEB staff has reviewed these submissions and has provided comments in reply below. OEB staff notes that BOMA, CME, IGUA, and OGVG supported the Draft Issues List and did not recommend any changes or additions.

OEB staff supports several minor wording changes and restructuring to increase clarity and ensure all relevant issues are captured. OEB staff has provided comments on the submissions of other parties below. Further, an updated draft issues list that reflects proposed changes supported by OEB staff is provided in Appendix A.

General Issues – New

Comments from SEC

SEC proposed that the following issue be added to the General Issues section:

- “Should the OEB continue to sole source DSM programs through Enbridge Gas Inc., or should some or all of the DSM offerings be designed and/or delivered by one or more other program administrators? If the latter, what process should be used to identify and procure the services of those new participants?”

SEC proposes that the OEB consider whether Enbridge Gas should continue to be the sole administrator of DSM programs or if other entities should be involved in their design and delivery. SEC argues that as DSM programs expand, relying solely on Enbridge Gas may no longer be appropriate, given its inherent conflict of interest in reducing natural gas use.

SEC has previously raised concerns that, in its view, Enbridge Gas’s DSM programs have become less effective and fail to meet ratepayer needs. SEC further notes that the current DSM Plan proposes significantly increased spending while falling short of the OEB's previously established targets. Without alternatives for comparison, SEC contends that the OEB cannot assess whether Enbridge Gas’s claims are valid or if a competitive process would yield better outcomes.

SEC argues that adding the proposed issue to the General Issues section would enable parties to propose alternative DSM program administrator models, scrutinize Enbridge Gas’s efforts to explore alternative approaches and assess whether competition would lead to improved results and cost efficiency.

OEB staff does not support including the new issue proposed by SEC. Enbridge Gas (and its predecessor companies) have long been the natural gas DSM program administrator in Ontario. The Minister of Energy and Electrification has suggested that Enbridge Gas will continue to be the DSM program administrator, at least in the near to medium term. For example, in the December 19, 2024 Letter of Direction to the OEB, the Minister provided his expectation that the OEB would work with the IESO and Enbridge Gas to deliver a customer-focused one-window platform for energy efficiency programs. Similarly, in Order in Council 1448/2024 (published November 22, 2024) the Minister directed that the IESO pursue the creation of a single delivery window for certain electricity conservation programs with Enbridge Gas’s residential and income-qualified natural gas DSM programs as approved by the OEB. The same Order in Council directs the IESO to work to fully integrate certain residential electricity conservation programs with future (i.e. programs approved after the last DSM proceeding, EB-2021-0002) Enbridge Gas residential DSM program offerings as

approved by the OEB. Any effort to create or authorize a new DSM program administrator in the near term could frustrate the Minister's direction that both the IESO and the OEB work with Enbridge Gas to facilitate a one-window platform.

SEC's proposed issue asks whether it would be appropriate for the OEB to in effect authorize or require some party other than Enbridge Gas to procure DSM services. It is not clear who that party might be, or exactly what authorization the OEB would be asked to grant. It is also not clear how the programs offered by this third party would be funded. Absent these details, it is difficult for OEB staff to comment on the OEB's jurisdiction to order such an arrangement.

Further, OEB staff respectfully disagrees with SEC's claim that without comparisons, the OEB will be unable to assess whether Enbridge Gas's proposals are appropriate. Although there are no specific current comparisons to Ontario-based DSM results, the OEB can look to feedback in the SAG report for insights. The SAG was composed of energy efficiency experts with decades of experience in planning, advising on, and evaluating plans and programs in other leading jurisdictions across North America. SAG members generally supported Enbridge Gas's proposed program concepts (key areas of focus, mix of strategies, target markets), including the proposed updates presented through the stakeholder consultation process which have been incorporated as part of its application, indicating that there has been some consideration of Enbridge Gas's proposals relative to other leading program administrators across North America.

OEB staff acknowledges that the SAG did not comment on Enbridge Gas's proposed targets and budgets. These are obvious areas of focus in this proceeding. The issues raised by SEC, including Enbridge Gas's performance, budget, natural gas savings levels, cost-effectiveness and value to ratepayers can all be assessed and critiqued through the issues list as currently drafted. Parties can make arguments that there should be changes in composition and/or magnitude (e.g., increases or decreases to natural gas savings targets), to the proposed programs or performance scorecards, including natural gas savings targets or budgets. Additionally, parties can request to file evidence that compares Enbridge Gas's past results and future proposals relative to other program administrators in North America. These comparisons can be used to suggest changes to program design or revised or new performance metrics that can be used by the OEB to ensure Enbridge Gas provides sufficient value for the significant ratepayer funding it has requested.

OEB staff further questions how the OEB would put an alternative administrator model into effect, even for a portion of the portfolio, in the context of this proceeding on Enbridge Gas's DSM plan application. OEB staff therefore also questions whether consideration of this issue is an efficient use of the OEB's and the parties' time and effort.

Draft Issue 1

Draft issues list 1 asked if 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?

Comments from Enbridge Gas

Enbridge Gas questioned the inclusion of the words “integrated planning” and recommended these words be removed. Enbridge Gas noted it was unclear on what Government policies would apply to this term. Enbridge Gas noted these words are not referenced in the DSM Framework, but instead, were included in the Minister of Energy and Electrification’s Renewed Letter of Direction to the OEB, where the Minister also refers to the Government of Ontario’s intention to develop a long-term Integrated Energy Plan.

OEB staff submits that Issue 1 should remain unchanged. Natural gas DSM is one component of effective system planning. As part of the OEB’s guidance regarding the main objective of DSM, it specifically makes mention of integrated resource planning, noting that “as experience is gained with the IRP framework, future considerations should be given to the role of DSM and how that relates to IRP activities as there is significant benefits to deferring and/or avoiding future natural gas infrastructure projects.”¹

Similarly, as Enbridge Gas notes, the Government of Ontario is expected to release a provincial Integrated Energy Plan at some point in 2025.

OEB staff is of the view that it is important for the OEB to consider Enbridge Gas’s proposals for significant ratepayer funding to support future DSM programs within the context of broader integrated energy planning direction.

Comments from Minogi Corp. and Three Fires Group Inc.

MC and TFG request that the OEB update draft Issues 1 and 3, ensuring that the DSM Plan incorporates the views and perspectives of Enbridge Gas’s Indigenous customers. The updates are shown below.

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

¹ OEB DSM Framework, pp. 1-2

circumstances of consumers and Indigenous communities? (emphasis added)

OEB staff is of the view that Indigenous communities, like all other consumer groups, is subsumed within the draft issue as drafted. However, OEB staff does not object to the suggested revision proposed by MC and TFG.

Comments from Pollution Probe

Pollution Probe suggested that it may be useful to indicate at the end of each issue additional wording such as “what changes or additions are required to address any gaps or deficiencies identified?” should parties interpret the issues wording as inherently restrictive.

OEB staff is of the view that this additional clarity is not needed as it is implied that if the answer to any of the questions posed as issues is no, that parties are able to propose changes, additions, revisions or alternatives to address any gaps or deficiencies identified.

Draft Issue 2

LIEN, VECC, EDC and GEC highlight that “DSM Framework” has been removed from draft Issue 1 and Issue 2 when it was included in the previous DSM plan proceeding which included:

2. Does Enbridge Gas’s 2023-2027 DSM Framework and DSM Plan adequately respond to previous OEB direction on future DSM activities (e.g., DSM Mid-Term Review Report, 2021 DSM Decision, OEB’s post-2021 DSM guidance letter)?
3. 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)

EDC and GEC recommended changes related to draft Issue 7, but failing updates there, that draft Issue 1 and Issue 2 re-introduce the DSM Framework as was included in the last DSM proceeding.

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

OEB staff submits that draft Issue 2 should be approved without any changes. OEB staff is of the view that, as drafted, the issue allows for consideration and assessment of how Enbridge Gas’s application responds to previous OEB direction, which includes the current DSM Framework that was approved by the OEB in its Decision and Order in EB-

2021-0002 (the 2022 DSM Decision).²

OEB staff is unsure if EDC, GEC, LIEN or VECC are suggesting the OEB undertake a more comprehensive review of the DSM Framework as part of this proceeding. If that is the case, OEB staff submits that the OEB should be clear that a broad policy review is out of scope for this proceeding. Rather, OEB staff submits that it is more practical to focus on the specific updates proposed by Enbridge Gas or other parties in this proceeding. This approach would be consistent with the OEB's normal approach to setting policy and adjudicating applications. It would also be consistent with recommendations made by the OEB's Stakeholder Advisory Group in its report, which stated:

“The group acknowledged that the OEB just considered many policy issues as part of the most recent DSM proceeding and approved an updated DSM policy framework. The group agreed that for practical purposes, non-utility member feedback and Enbridge’s pending multi-year DSM plan application must proceed based on the guidance provided in the OEB’s DSM Decision and the current policy framework.

Non-utility members agreed that should participants in Enbridge’s next multi-year DSM plan proceeding raise policy concerns (for example, regarding the primary objective of DSM, reasonableness of guiding principles, or other structural items), that these be addressed separately, either simultaneous to the DSM plan application proceeding (but not directly applicable) or immediately following the OEB’s decision. This way, updated policy direction will be available to inform Enbridge’s DSM planning efforts for its next multi-year plan.”³

Given the recent approval of the updated DSM Framework in the 2022 DSM Decision, a complete review is unnecessary and could delay the adjudication process without significant benefits for ratepayers. Further, at the time of issuing the 2022 DSM Decision, the OEB did not indicate that broad policy changes are required for the post-2025 Enbridge Gas DSM plan.

The unique nature of Enbridge Gas's 2022 DSM plan application process, which followed the OEB's December 1, 2020 letter concluding the post-2020 DSM Framework consultation, supports this approach.⁴ The OEB provided initial policy guidance to assist Enbridge Gas in developing its 2022 DSM plan application, not a comprehensive updated policy framework. Instead, in its December 1, 2020 letter, the OEB invited

² EB-2021-0002, Decision and Order, November 15, 2022, Schedule E

³ EB-2022-0295, Natural Gas Demand Side Management Stakeholder Advisory Group Report, November 11, 2024, p. 14

⁴ EB-2019-0003, OEB Letter, December 1, 2020

Enbridge Gas to file a comprehensive DSM plan application for programs starting in 2022.⁵

Consistent with this direction, as part of Enbridge Gas's 2022 DSM plan application, it proposed an updated DSM Framework. The OEB ultimately approved an updated DSM Framework indicating that it "should be used going forward to guide the development of future ratepayer funded DSM activities."⁶ In line with this direction from the OEB, OEB staff submits that, as drafted, Issue 2 allows parties to consider Enbridge Gas's application relative to previous OEB direction, including the current DSM policy framework. Therefore, OEB staff submits that no changes are required.

Draft Issue 3

Similar to draft Issue 1, MC and TFG request that the OEB incorporate the underlined revisions to draft Issue 3 to ensure consideration of the views and perspectives of Enbridge Gas's Indigenous customers.

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?

OEB staff supports this revision. As part of the 2022 DSM Decision, the OEB indicated its expectation that Enbridge Gas would undertake greater stakeholder engagement with Indigenous representatives to inform this application.⁷

Draft Issue 4

(no comments)

Draft Issue 5

(no comments)

Draft Issue 6

Comments from Enbridge Gas

Enbridge Gas proposed to re-word this issue to:

6. Does Enbridge Gas's DSM plan appropriately include proposed inclusion of electrification/fuel switching program offerings appropriate measures/opportunities?

⁵ Ibid

⁶ EB-2021-0002, Decision and Order, November 15, 2022, p. 16

⁷ Ibid, p. 51

Enbridge Gas noted that there are no specific electrification/fuel switching program offerings being proposed, but that there are measures within certain program offerings which may lead to fuel switching.

OEB staff supports Enbridge Gas's proposed revision as this will still enable parties to assess the reasonableness of Enbridge Gas's proposals related to fuel switching and electrification.

Comments from EDC and GEC

EDC and GEC did not propose any revisions to this issue. However, they questioned the need to separate the appropriateness of electrification/fuel switching as it would appear to be subsumed within the General Issues (Issues 1-4) and the program offering issue (Issue 12). EDC and GEC noted that the OEB's 2022 DSM Decision provided discrete findings regarding the inclusion of fuel switching and electrification in Enbridge Gas's DSM plan.

OEB staff recommends that the issue remain separate from the others due to its significance in terms of program costs and benefits, particularly as included in a DSM plan administered by a natural gas distributor.

Draft Issue 7

Comments from EDC and GEC

EDC and GEC proposed that draft Issue 7 be amended to clarify that Enbridge Gas is not the only party that may propose updates to the DSM Framework. EDC and GEC noted that this would be consistent with the OEB's 2022 DSM Decision which stated that "the OEB will consider future updates or revisions to the DSM Framework where necessary," without limiting the ability to propose said updates to Enbridge Gas. The proposed amended issue is:

7. Is the proposed DSM Framework appropriate?

OEB staff does not support EDC and GEC's proposal. For the reasons set out in response to the proposed changes to Issue 2, OEB staff recommends that the OEB confirm this proceeding is to test the merit and reasonableness of Enbridge Gas's proposed DSM plan and specific changes to the DSM Framework, not consider broad policy changes.

OEB staff submits that as currently drafted, parties can challenge the specific changes Enbridge Gas has proposed to the DSM Framework. However, should proposed changes to the DSM Framework become too far reaching, it may necessitate that Enbridge Gas reconsider significant portions of its DSM plan. The OEB will want to

consider the value of considering material changes to the DSM Framework, including if they provide additional benefits to ratepayers, impacts to the efficiency and effectiveness of the OEB's adjudicative proceeding and potential market impacts of delaying the implementation of future programming.

Draft Issue 8

Comments from Enbridge Gas

Enbridge Gas suggested additional wording be added to this issue to also include consideration of the OEB's guiding principles in the DSM Framework when considering budget proposals. Enbridge Gas proposed:

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 and guiding principles in its DSM Framework?

OEB staff supports this proposed change for its added clarity.

Comments from LIEN and VECC

LIEN and VECC suggested additional wording be added to the end of this issue, similar to what was included in Issue 6 in EB-2021-0002. LIEN and VECC proposed:

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?

OEB staff submits that the proposed change is not necessary as it is already included in the OEB's objectives⁸ and noted in the DSM Framework under Section 4 – DSM Budgets:

“The OEB's objectives with respect to natural gas include the requirement to protect the interests of consumers with respect to prices, reliability, and quality of gas service. The OEB also has an objective to promote energy conservation and energy efficiency but with consideration for the consumer's economic circumstances. Therefore, in approving any budget amount, it is necessary for the OEB to consider the rate impacts, or overall cost impacts, to customers, as all DSM costs are recovered through distribution rates.”⁹

However, if the OEB is of the view that the proposed wording would be useful to have

⁸ OEB Act, 1998, Section 2(5)

⁹ EB-2021-0002, Decision and Order, Schedule E, p. 4

included explicitly in Issue 8, OEB staff does not object.

Draft Issue 9

(no comments)

Draft Issue 10

(no comments)

Draft Issue 11

Enbridge Gas proposed that this issue be expanded to also reference its proposed Large Volume opt-out framework. Enbridge Gas proposed:

11. “Is Enbridge Gas’s proposed Large Volume Program Scorecard, including targets and performance metrics appropriate, including the impact of the opt-out framework proposal as proposed?”

OEB staff supports this proposed change to ensure Enbridge Gas’s full proposal can be considered.

Draft Issue 12

Comments from Enbridge Gas

Enbridge Gas proposed that this issue be amended to encompass all of the DSM Framework’s objectives and guiding principles which have informed the development of its application and the DSM SAG Report. Enbridge Gas submitted that maximizing natural gas savings and providing best value for ratepayers are objectives subsumed in the DSM Framework’s objectives and guiding principles. Enbridge Gas proposed:

12. “Has Enbridge Gas proposed an optimal suite of program offerings that ~~will maximize natural gas savings and provide the best value for rate payer funding~~ is responsive to the DSM Framework’s objectives and guiding principles?”

OEB staff supports this proposed change. As noted by Enbridge Gas, maximizing natural gas savings and providing best value for ratepayers are already included in the objectives and guiding principles of the DSM Framework and therefore can be a focus for parties in this proceeding.

Enbridge Gas also recommended that sub-issue 12(b) is not necessary as the Residential Building Beyond Code offering is a subset of and part of the Residential Program referenced in Draft sub-issue 12(a).

OEB staff supports this proposed change as it does not impact parties’ ability to test

Enbridge Gas's proposed program and offerings.

Comments from SBUA

SBUA suggested that a new sub-issue be added to draft Issue 12 to ensure that the unique energy needs of small and micro businesses do not fall between the crack of larger commercial and residential interests in the proceeding. SBUA proposed:

- Are Enbridge Gas's proposed program offerings for small and micro business customers appropriate?

OEB staff supports this proposed addition. The OEB was clear in the 2022 DSM Decision that it expected Enbridge Gas "should give further consideration to additional opportunities for the program offers to evolve and reflect practical realities, including those faced by small businesses...".¹⁰

Draft Issue 13

Enbridge Gas proposed an update to increase the clarity of this issue, removing the term "intentions" and proposing the following:

13. "Are Enbridge Gas's research and development ~~intentions and activities~~ proposals appropriate?"

OEB staff supports this change as it does not limit parties' ability to test Enbridge Gas's proposal.

Draft Issue 14

CCC proposed a change to draft Issue 14 to expand the scope of the issue. CCC indicated that parties should have an opportunity to consider all components of the EM&V process, not just the changes proposed by Enbridge Gas. This may include consideration of the free ridership rates for Enbridge Gas's programs or whether the current overall EM&V process is appropriate. CCC proposed:

14. ~~Are Enbridge Gas's~~ Is the proposed ~~changes to the~~ evaluation, measurement and verification of natural gas savings appropriate?

OEB staff submits that Enbridge Gas's proposals related to program evaluation, including net-to-gross values (proxy values and application to targets) can be reviewed within Issue 14 (EM&V). Other evaluation proposals, including program evaluation plans, approaches to gross savings measurement, process evaluations for specific programs/offerings can be reviewed within Issue 12 (programs). OEB staff does not

¹⁰ EB-2021-0002, Decision and Order, p. 37

support making this issue broader. The OEB approved the structure of the evaluation process as part of the DSM Framework, including roles and responsibilities for central tasks. OEB staff submits that fundamental changes to the DSM Framework should be out of scope in this proceeding.

Draft Issue 15

(no comments)

Draft Issue 16

(no comments)

Draft Issue 17

Pollution Probe recommended that it appears that draft Issue 17 implicitly considers the efficient and effective coordination of DSM and IRP as intended by the OEB. It suggested that the OEB may wish to make this clear by amending this issue to specifically indicate as much.

OEB staff is of the view that coordination between DSM and IRP is subsumed within this issue as well as draft Issue 8 which allows for consideration of proposals relative to the DSM objectives. Therefore, no updates are required. However, should the OEB find that this additional clarity is useful, OEB staff does not object.

Draft Issue 18

Comments from CCC

CCC commented on the ability to consider Enbridge Gas's overall programs and budgets in relation to the Government of Ontario's recently announced expanded electricity energy efficiency portfolio. CCC sought clarification that this could be explored under draft Issue 1.

OEB staff submits that draft Issue 1 provides sufficient flexibility for parties to seek to further understand Enbridge Gas's proposal relative to the policies of the Government of Ontario, including announcements for expanded electricity energy efficiency programming.

Comments from Pollution Probe

Pollution Probe suggested that although the current draft Issue 18 implicitly includes coordination with municipalities, the OEB may wish to make this clear.

OEB staff submits that the current draft Issue 18 is sufficiently broad to allow parties to explore the reasonableness of Enbridge Gas's coordination efforts with other energy

conservation programs, including those administered by municipalities.

All of which is respectfully submitted.

Appendix A

OEB Staff Proposed Revisions to the Draft Issues List

Enbridge Gas's Multi-Year Natural Gas Demand Side Management (DSM) Application (2026-2030)

General Issues

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 of consumers and Indigenous communities?
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)?
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?
4. Is Enbridge Gas's 2026-2030 DSM plan consistent with energy conservation industry best practices in Ontario and other relevant Canadian and U.S. jurisdictions?
5. Is Enbridge Gas's proposed DSM Plan term of 2026-2030 appropriate?
6. ~~Does Is~~ Enbridge Gas's DSM Plan appropriately include ~~proposed inclusion of~~ electrification/fuel switching measures/opportunities ~~program offerings appropriate?~~

Specific Issues within Enbridge Gas' 2026-2030 DSM Application

7. Are Enbridge Gas's proposed updates to the OEB's DSM Framework appropriate?
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 and guiding principles in its DSM Framework?

9. Is Enbridge Gas's proposed cost recovery approach appropriate?
 - a. Are there any other cost recovery approaches that should be included in addition to or to replace the approach proposed by Enbridge Gas?

10. Are Enbridge Gas's proposed shareholder incentives appropriate?
 - a. Is Enbridge Gas's proposed annual maximum shareholder incentive, including structure, and amount appropriate?
 - b. Are there any other incentive mechanisms that should be included in addition to or to replace those proposed by Enbridge Gas?

11. Are Enbridge Gas's proposed scorecards, including performance metrics, metric weightings, and targets appropriate?
 - a. Is Enbridge Gas's proposed Residential Program Scorecard, including targets and performance metrics appropriate?
 - b. Is Enbridge Gas's proposed Income Qualified Program Scorecard, including targets and performance metrics appropriate?
 - c. Is Enbridge Gas's proposed Commercial Program Scorecard, including targets and performance metrics appropriate?
 - d. Is Enbridge Gas's proposed Industrial Program Scorecard, including targets and performance metrics appropriate?
 - e. Is Enbridge Gas's proposed Large Volume Program Scorecard, including targets and performance metrics appropriate, including the impact of the opt-out framework proposal as proposed?
 - f. Should there be any other scorecards, targets and/or metrics included in addition to or to replace those proposed by Enbridge Gas?

12. Has Enbridge Gas proposed an optimal suite of program offerings that ~~will maximize natural gas savings and provide the best value for rate payer funding~~ is responsive to the DSM Framework's objectives and guiding principles?
 - a. Are Enbridge Gas's proposed program offers for residential customers appropriate?
 - b. ~~Are Enbridge Gas's proposed residential beyond building code program offerings appropriate?~~

- c. Are Enbridge Gas's proposed program offerings for income qualified customers appropriate?
 - d. Are Enbridge Gas's proposed program offerings for commercial customers appropriate?
 - e. Are Enbridge Gas's proposed program offerings for industrial customers appropriate?
 - f. Are Enbridge Gas's proposed program offerings for large volume customers appropriate?
 - g. Are Enbridge Gas's proposed program offerings appropriate for customers in Indigenous communities?
 - h. Should there be any other program offerings included in addition to or to replace those proposed by Enbridge Gas?
 - i. Are Enbridge Gas's proposed program offerings for small and micro business customers appropriate?
13. Are Enbridge Gas's research and development ~~intensions and activities~~ proposals appropriate?
14. Are Enbridge Gas's proposed changes to the evaluation, measurement and verification of natural gas savings appropriate?
- a. Are Enbridge Gas's proposed deemed proxy net-to-gross ratios appropriate?
 - b. Is Enbridge Gas's proposal for the application of updates to deemed net-to-gross ratios appropriate?
15. Are Enbridge Gas's proposed updates to the treatment of input assumptions, cost-effectiveness, and avoided costs appropriate?
16. Is Enbridge Gas's proposed rate allocation methodology, and accounting treatment, including the function of various deferral and variance accounts appropriate?
17. Does Enbridge Gas's proposed 2026-2030 DSM Plan require any changes to be consistent with the direction and guidance regarding Integrated Resource Planning?

18. 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?
- a. Is Enbridge Gas's proposed approach to natural gas savings attribution when coordinating or collaborating with other programs appropriate?
19. Is there any transition and/or implementation guidance required related to the proposed 2026-2030 DSM plan and any future DSM plan application?