

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

May 12, 2025

**EB-2024-0198 – Enbridge 2026-2030 DSM Application
Pollution Probe Letter of Comment**

Dear Ms. Marconi:

Pollution Probe is in receipt of the Ontario Energy Board's (OEB's) letter¹ dated March 24, 2025 in response to Enbridge's March 20, 2025 abeyance request². Enbridge's abeyance request was based on the need to update its Demand Side Management (DSM) Plan evidence for one factor (fuel charge) that has changed since the evidence was submitted. In its March 24, 2025 letter the OEB required Enbridge to provide an update by May 2, 2025 on the progress Enbridge has made updating its evidence.

Enbridge provided an update letter on May 2, 2025³ requesting that the OEB roll over the current 2023-2025 DSM Plan into 2026. It is not clear if the updates have been made to the DSM plan or what additional time is required to make those changes. Over the decades ratepayers have invested significant funds into the information technology (IT) systems used by Enbridge to plan and operate DSM. Those systems are sophisticated and enable numerical updates and scenario analysis. It would be helpful to understand what additional time is required for Enbridge to digest the results of the factor update (e.g. in the TRC plus test) and making the necessary updates to the DSM evidence. Similarly, it would be helpful to understand how that information would impact Enbridge's proposed one year roll over proposal and how long it would take Enbridge to file that information. It is unclear how the OEB could consider a one-year plan roll over without first understanding the impacts of the updates raised by Enbridge in the abeyance request letter. Those impacts will be relevant whether there is a full five-year plan or a one-year extension to the current plan.

Enbridge notes in its May 2, 2025 update letter that it has undertaken changes to the DSM programs and highlights a new joint program agreement with IESO that is in place for 2025 and continues into 2026 and likely beyond. Enbridge has the flexibility to make certain updates to the DSM portfolio over the term of a plan as long as they are in compliance with OEB requirements. Pollution Probe made recommendations in the previous DSM proceeding⁴ that Enbridge not wait until 2026 to implement improvements that were needed to deliver more DSM results and unlock cost efficiencies. It is positive to see that Enbridge has advanced some of those partnership recommendations during the current plan and plans to apply them to the new plan term starting in 2026. Implementation of new program and

¹ OEB_AbeyLtr_EGI_DSM_Plan_20250324

² EGI_Ltr_AbeyanceRequest_20250320

³ EGI_Abeyance_StatusUpdate_20250502

⁴ EB-2021-0002

partnership opportunities should not be delayed if they can provide greater DSM results and reduce ratepayer costs (i.e. unlock partnership efficiencies), both key factors in meeting the direction provided by the OEB in the EB-2021-0002 Decision⁵ (more meaningful natural gas reductions starting in 2026). Prior to the 2023-2025 DSM Plan review and approval there were two successive one-year roll overs which impacted progress on delivering more meaningful DSM results to Ontarians. If the OEB decides to consider a one-year roll over into 2026, it is important that it not delay the intended process for review and approval of the next generation multi-year DSM Plan. Parking the review of the new multi-year plan could result in the same issues heading into 2027.

It appears that Enbridge has already implemented some of the plan improvements identified by stakeholders and the OEB and it will be important to understand which of these are in place or could be implemented in 2026 vs. which plan enhancements will need to wait until the next multi-year plan is filed for approval. Either way, there are pertinent issues that will need to be considered by the OEB before it determines next steps. One of these issues is the one raised by Enbridge and the basis of the abeyance and plan updates. It is unclear how this single factor would affect the 2026-2030 plan or Enbridge's proposed one-year roll over of the current plan. Another example is the program changes underway in 2025 and/or those proposed in 2026. Enbridge or other stakeholders may have suggestions on other issues that may need to be considered by the OEB prior to making a decision. Based on the OEB's last DSM Decision, it appears that the OEB could support implementing enhancements in 2026, even if it is for a one-year period. Pollution Probe looks forward to future direction from the OEB on how it intends to review Enbridge's request and the impacts it would have on either the next five-year plan and/or one year review and approval related to 2026.

It was initially unclear to Pollution Probe, but the OEB confirmed that the EB-2024-0198 proceeding is intended to be a Pilot to provide real information prior to the OEB moving forward with its 10 Point Action Plan⁶. If the OEB decides to truncate or delay the DSM Plan proceeding based on Enbridge's recommendation, it appears that the OEB may need to select a different Pilot proceeding and/or delay analysis of the Pilot results until the Pilot proceeding is complete.

Respectfully submitted on behalf of Pollution Probe.



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⁵ EB-2021-0002 Dec_Order_EGI_DSM Plan_20221115

⁶ EB-2025-0098 OEBItr_Tariff Increase and Intervenor Categories_20250423, page 2.