

Elson Advocacy

June 19, 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 request that the OEB develop the next procedural order in such a way as to allow adjudication on whether the new DSM plan would start in 2027 as Enbridge proposes, or mid-way through 2026 as EDC/GEC propose.

Although some rollover into 2026 seems necessary in the circumstances, the rollover period should be as short as possible, including for the following reasons:

- **Greater bill savings:** A rollover means that energy bill savings will remain at current levels whereas the new plan will result in higher savings by enabling greater levels of cost-effective energy efficiency programming. The sooner a new plan can be implemented, the better off customers will be.
- **Consistency with OEB direction:** In its previous DSM decision, the OEB stated that it “expects that, at a minimum, the level of natural gas savings from DSM programs during the next multi-year term will be the equivalent of at least 0.6% of sales in 2026, 0.8% of sales in 2027” Enbridge will come nowhere near to those targets with a rollover. The sooner they implement a new plan, the closer they will come to meeting OEB expectations.
- **OEB oversight:** In light of significant changes that have occurred, the current residential DSM plan is very unlike the one approved by the OEB. Although tweaks may be possible in the rollover, robust OEB oversight and guidance will not likely occur until a new plan is put into place. The sooner this occurs, the better.

We assume that Enbridge will be wary to move to a new plan mid-year for administrative reasons. Although this will presumably raise complications, it is not impossible and the benefits

outlined above outweigh administrative challenges. Enbridge has changed its offerings mid-year before and it can do so again.

We are not at this stage attempting to convince the OEB to decide to restrict the rollover period to mid-2026 as the OEB has not sought submissions on that subject. We are merely attempting to show that this warrants consideration such that this can be addressed in the upcoming procedural steps. If it is not addressed in the upcoming procedural steps, the OEB will slide into Enbridge's proposal by default because it will be too late to complete the adjudication of the new plan until the end of 2026. To keep a mid-2026 changeover possible, the new plan will presumably need to be filed soon. We ask that the next procedural order either require that or leave that possibility open.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', is written over a horizontal line.

Kent Elson

cc: Parties in the above proceeding