

Elson Advocacy

July 16, 2025

Nancy Marconi

Registrar, Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4
registrar@oeb.ca

Dear Ms. Marconi

Re: EB-2024-0198 Enbridge Gas Inc. 2026 DSM Plan – Evidence Proposal

I am writing on behalf of the Small Business Utility Alliance ("SBUA") in response to the letter of Enbridge dated July 14, 2025. Enbridge asks the OEB to rule that the arguments that Enbridge anticipates SBUA raising in this proceeding are out of scope. SBUA has no intention of raising issues beyond the scope that is clearly set out in *Procedural Order #4* and the order requested by Enbridge is not justified.

As indicated in my previous letter, "SBUA wishes to explore whether modest revisions to the eligibility criteria of the proposed 2026 Residential Program could begin addressing the Board's comments in its previous DSM Order regarding the needs of small and micro business customers." Enbridge's letter presumes that this will result in a request for major changes to Enbridge's offerings, including changes to the commercial program. That is not the case. SBUA does not propose changes to the commercial program and any adjustments to the residential program would be narrow.

Enbridge makes a variety of substantive arguments that are premature. SBUA has not put forward specific changes to the residential program availability at this stage. It is premature to ask that certain adjustments to the residential program be ruled out of scope before they can even be explored and proposed. It is inefficient to consider these substantive issues at this stage. For the time being, SBUA is merely exploring potential modest changes to the eligibility criteria for the residential program.

SBUA will explore this at the technical conference, including via questions around the issues raised in Enbridge's letter. SBUA will decide whether to put forward any changes, and what they might be, only after further exploration. SBUA may ultimately decide that no changes are tenable for 2026 or may only recommend a very narrow change. It is both premature and inefficient for these issues to be considered and ruled on in advance of the technical conference where they can be explored further.

Yours truly,



Kate Siemiatycki