

# Elson Advocacy

July 30, 2025

**BY RESS**

**Ritchie Murray**  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, Ontario M4P 1E4

Dear Mr. Murray:

**Re: EB-2025-0156 – Consultation on the Regulatory Treatment of Local  
Electricity Demand-side Management (Stream 2) Programs**

We write on behalf of Environmental Defence with a request to participate in the OEB's upcoming consultation regarding the regulatory treatment of eDSM Stream 2 Programs ("Stream 2 Programs"). We also request that Environmental Defence be granted costs eligibility in accordance with the OEB's letter dated July 23, 2025.

## **Nature of Interest in the Consultation**

Environmental Defence seeks participant status and costs eligibility as a leading environmental organization that represents the public interest in environmental protection and the interests of ratepayers who want both clean and affordable energy.

Environmental Defence is well-placed to meaningfully contribute to the Board's consideration of regulatory review options for Stream 2 program applications, as identified in the OEB's July 23<sup>rd</sup> letter. Environmental Defence and its counsel has participated in multiple OEB processes on related topics, including the consultations on the Framework for Energy Innovation and the Benefit-Cost Analysis. Environmental Defence has also explored energy efficiency and integrated resource planning issues (including non-wires solutions) in electricity distributor rates cases.

Environmental Defence has been granted intervenor status, participant status, and costs eligibility in over 60 proceedings before the Ontario Energy Board over the past decade. Environmental Defence's energy counsel, Kent Elson, has over 15 years of experience with Ontario Energy Board matters.

## **Grounds for Eligibility and Need for Funding**

Environmental Defence is eligible for an award of costs under section 3.03(a) and (b) of the Practice Direction on Costs Awards as it represents “an interest or policy perspective relevant to the Board’s Mandate,” including environmental protection, and the “direct interest of consumers” whose energy bills can be reduced through measures such as appropriate rate design, integrated resource planning, and reduced transmission losses.

Environmental Defence has no funding to participate in this process without an award of costs eligibility.

## **Further Details Regarding Environmental Defence**

### *A. Mandate and Objectives of Environmental Defence*

Environmental Defence has been working since 1984 to protect Canadians’ environment and human health. Environmental Defence’s mandate and objective is to challenge, and inspire change in government, business and people to ensure a greener, healthier and prosperous life for all. Its vision is to create a world Canadians are proud to pass on to their children.

### *B. Membership and Constituency*

Environmental Defence is supported by many thousands of donors across the province and country. It sees its constituency as Canadians who are concerned about the environment and the legacy that we will pass on to our children.

### *C. Types of Programs and Activities that Environmental Defence Carries Out*

Environmental Defence has been highly successful in its public interest advocacy on energy issues. Environmental Defence’s environmental work, on issues ranging from toxic chemicals to clean beaches, has led to concrete improvements in the lives of Canadians. For example, the dangerous chemical Bisphenol A (“BPA”) is now banned in baby bottles in Canada due to concerns first raised by Environmental Defence in 2007. For many years, Environmental Defence has participated in the federal government’s Chemicals Management Plan.

Environmental Defence is also the coordinator of Blue Flag Canada, which certifies beaches so that Ontario families can enjoy this public resource. It also co-founded Blue Green Canada with the United Steelworkers, which promotes green energy initiatives that have positive employment and economic impacts.

Environmental Defence also publishes reports and guides in the area of energy conservation, efficiency, and policy. For example, it has created an interactive online tool to help energy consumers reduce their bills through energy efficiency initiatives. Some further publications include:

- *Building an Ontario Green Jobs Strategy*
- *Ontario's Electricity System, a Backgrounder*
- *Canada's Methane Gas Problem: Why strong regulations can reduce pollution, protect health, and save money*
- *Powering up efficiency to get the conservation framework right*
- *The \$2 Billion Question - How Can Ontario Reinvest Cap-and-Trade Proceeds to Meet its Climate Challenge and Grow the Economy?*
- *What to Look for in the Canadian Energy Strategy*
- *Backgrounder - Coal and Renewable Energy in Ontario*
- *Building Ontario's Green Economy: A Road Map*
- *Ontario Feed-In Tariff: 2011 Review*
- *The Global Clean Energy Jobs Race: Ontario's Opportunity*
- *Blowing Smoke: Correcting Anti-Wind Myths in Ontario*
- *Faces of Transformation: Jobs, economic renewal and cleaner air from Year*
- *One of Ontario's Green Energy Act*
- *Falling Behind: Canada's Lost Clean Energy Jobs*
- *Greening Canada's Building: Report Card*

Environmental Defence is a frequent intervener. Its frequent intervener form may be found at the following link: <https://www.rds.oeb.ca/CMWebDrawer/Record/804452/File/document>.

### **Requests for Evidence and Addresses of Representatives**

Environmental Defence requests that electronic copies of the pre-filed materials and all other documents in the proceeding be delivered to the following counsel:

Electronic copies to:

#### **Elson Advocacy**

**Kent Elson**

**Kate Siemiatycki**

1062 College Street, Lower Suite

Toronto, Ontario M6H 1A9

Tel: (416) 906-7305

Fax: (416) 763-5435

E-mail: [kent@elsonadvocacy.ca](mailto:kent@elsonadvocacy.ca) | [kate@elsonadvocacy.ca](mailto:kate@elsonadvocacy.ca)

We also request that the above individuals be listed on the participants' list under Environmental Defence.

**Address of Environmental Defence**

Environmental Defence's full name and address is:

**Environmental Defence Canada Inc.**

33 Cecil Street, 1<sup>st</sup> Floor  
Toronto, Ontario M5T 1N1  
Tel: (416) 323-9521  
Fax: (416) 323-9301

However, please send correspondence and any other materials to counsel as the authorized representatives.

**Service on other Parties**

Environmental Defence requests the Board's directions as to whether this letter should be served on any other parties.

Please do not hesitate to contact me if anything further is required.

Yours truly,



Kent Elson