



By EMAIL and RESS

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July 31, 2025
Our File: 20240198

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attn: Ritchie Murray, Acting Registrar

Dear Mr. Murray:

Re: EB-2024-0198 – Enbridge DSM Plan – Cost-Effectiveness Issue

We are counsel to the School Energy Coalition ("SEC"). This letter presents a question to the Applicant arising out of statements subsequent to the Technical Conference.

At a meeting of the IRP Working Group on July 30, 2025, the senior spokesperson for Enbridge advised that, in Enbridge's view, "the OEB has neither the jurisdiction nor the mandate to include a cost of carbon in cost effectiveness tests". The statement is consistent with a slide presentation from Enbridge on that point. While the statement was made in relation to IRP cost effectiveness, when asked how that would apply to DSM, the person said that the Enbridge position on jurisdiction and mandate is consistent for all cost effectiveness testing.

SEC had not heard this position before. Had we heard it prior to the Technical Conference in this matter on July 24th, we would of course have asked questions about it, as cost effectiveness is an important issue for the proposed 2026 DSM Program rollover.

We therefore ask that the OEB order the Applicant Enbridge to respond in writing (essentially as a late undertaking in the Technical Conference) making clear their position on the jurisdiction and mandate of the OEB to include in cost-effectiveness tests monetization of externalities such as the cost of carbon or other environmental or societal impacts. SEC believes this will affect the positions many parties, including SEC, take on the proposed 2026 DSM spending.

All of which is respectfully submitted.

Yours very truly,
Shepherd Rubenstein Professional Corporation

A handwritten signature in dark ink, appearing to read "Jay Shepherd", is written over a light blue horizontal line.

Jay Shepherd

cc: Brian McKay, SEC (by email)
Interested Parties (by email)

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