



**BY EMAIL**

August 7, 2025

**To: All Parties in EB-2024-0198**

**Re: Correspondence from School Energy Coalition and Enbridge Gas Inc.  
Regarding Cost-Effectiveness**

On December 2, 2024, Enbridge Gas Inc. (Enbridge Gas) filed a multi-year natural gas demand side management (DSM) plan application with the Ontario Energy Board (OEB).

On July 3, 2025, the OEB issued [Procedural Order No. 4](#), setting out the next steps in this proceeding, including consideration of Enbridge Gas's updated request to rollover its 2023–2025 programs into 2026. Given the limited scope of the rollover request, the OEB established a streamlined process with a focus on the proposed Residential Program due to the forecast cost-effectiveness results having a Total Resource Cost-Plus ratio of less than 1.0. The OEB acknowledged that some parties may have views regarding other aspects of Enbridge Gas's DSM plan beyond the Residential Program. The OEB indicated that these can be addressed as part of written submissions, along with any items related to the Residential Program.

A technical conference focused on the Residential Program was held on July 25, 2025.

On July 31, 2025, the School Energy Coalition (SEC) filed a letter with the OEB, requesting that the OEB direct Enbridge Gas to clarify its position on the OEB's jurisdiction to include monetized externalities, (such as the cost of carbon and other environmental or societal impacts), in the cost-effectiveness analysis of DSM programs. This request followed a statement made by Enbridge Gas at the July 30, 2025, Integrated Resource Planning Working Group meeting.

SEC noted that Enbridge Gas's position had not been disclosed prior to the Technical Conference, and that had it been, SEC would have asked questions about it. SEC submitted that the issue is material to the evaluation of the 2026 DSM rollover and may affect the positions of other parties.

On August 1, 2025, Enbridge Gas responded, requesting that the SEC's request be denied, citing [Procedural Order No. 3](#), which confirmed that consideration of the social

cost of carbon is to be addressed in the 2027+ DSM plan proceeding and not in the 2026 rollover application. Enbridge Gas argued that SEC's request is outside the scope of the current proceeding and procedurally inappropriate, as it stems from an unrelated forum and involves a legal issue best addressed through formal submissions.

The OEB confirms that, consistent with direction provided in Procedural Order No. 2<sup>1</sup> and Procedural Order No. 3,<sup>2</sup> matters related to the social cost of carbon will be considered as part of the broader multi-year DSM plan application and are out of scope for the 2026 DSM rollover application. Consistent with direction provided in Procedural Order No. 4, the OEB remains committed to an efficient process for the 2026 rollover application and will not require submissions on the OEB's jurisdiction to include monetized externalities in the cost-effectiveness analysis as part of this process. The OEB will determine the appropriate path forward regarding the issues related to the 2027+ DSM plan at a later date and in response to Enbridge Gas's application for approval of a new multi-year DSM plan.

Please direct any questions relating to this application to the Case Manager, Michael Bell, at 416-440-7688 or [michael.bell@oeb.ca](mailto:michael.bell@oeb.ca).

Yours truly,

Ritchie Murray  
Acting Registrar

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<sup>1</sup> Decision on Issues List and Procedural Order No. 2, April 10, 2025, p. 22.

<sup>2</sup> Procedural Order No. 3, May 13, 2025, p. 2.