

August 14, 2025

Sent By Electronic Mail and Filed on RESS

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

Dear Mr. Murray:

**Re: Enbridge Gas Inc. (“Enbridge Gas”)
2026 DSM Rollover Application (“Application”)
Ontario Energy Board (“OEB”) File No. EB-2024-0198
Exhibit JT1.6 – Request for Confidential Treatment**

We write this in support of the letter filed by counsel for Enbridge Gas yesterday (the “**A&B Letter**”), responding to correspondence from Pollution Probe dated August 12, 2025, and correspondence from counsel to School Energy Coalition (“**SEC**”) dated August 12, 2025 and August 14, 2025.

As noted in Enbridge Gas’s confidentiality request letter of August 8, 2025, the IESO and Enbridge Gas reviewed the Collaboration and Cooperation Agreement (the “**Agreement**”) in order to determine whether any elements of the Agreement should be made the subject of a request for redaction on the basis of non-relevance and/or confidentiality, in accordance with the OEB’s *Practice Direction on Confidential Filing* (revised December 17, 2021). The IESO and Enbridge Gas agreed that the redacted elements in the confidential version filed with the OEB (the “**Non-Relevant Elements**”) should be redacted on the basis that they have no relevance to the Application, and in many cases, also would *result in potential harm if disclosed*.

The purpose of this letter is three-fold: (a) to confirm Enbridge Gas’s description of the Non-Relevant Elements as set out in the A&B Letter; (b) to set out the potential harm to the IESO that could result if the Non-Relevant Elements were disclosed; and (c) to address the argument by Pollution Probe that the Agreement is “synonymous” to the Greener Homes Grant Program Agreement, and therefore should be disclosed.

Description of Non-Relevant Elements: The third and fourth paragraphs in the A&B Letter accurately describe the content of the Non-Relevant Elements that have been redacted in the confidential version. Specifically:

- *Erroneous Pages:* 7 full pages have been redacted because they were erroneously included in the execution version of the Agreement (i.e., extra pages were inadvertently included in the Schedules to the Agreement at the time of signature).

These pages were never intended to form part of the Agreement, and the IESO and Enbridge Gas will amend the Agreement to remove these pages.

- *Branding Style Guidelines*: The last 37 full pages have been redacted because they are comprised entirely of the branding style guidelines for the Home Renovation Savings Program (“**HRSP**”) (i.e., the rules, marks and templates to be used to ensure consistency of style across HRSP documentation).
- *Cybersecurity Information*: 3 full pages comprising the cybersecurity protocol have been redacted. These pages set out the process that Enbridge Gas and the IESO will follow to prevent and manage any cybersecurity incidents.
- *IESO Incident*: 1 full page regarding an IESO-related incident, which is currently being investigated has also been redacted.
- *Numerical Information*: The remaining redactions are minimal, and comprised of: (a) insurance coverage and cumulative liability limits; (b) certain program set-up expense contribution percentages; and (c) certain figures in the illustrative cost sharing example related to years beyond 2026 or HRSP streams being offered solely by the IESO. As correctly noted in the A&B Letter (and the initial confidential request of August 8, 2025), none of this information provides any insight into cost-sharing as between Enbridge Gas and the IESO.

Harm to the IESO: In addition to having no relevance to the OEB’s determination of the issues in this proceeding, most of the Non-Relevant Elements (if disclosed) could result in potential harm to the IESO if disclosed. Specifically:

- *Branding Style Guidelines*: If released publicly, the branding style guidelines could be used by bad actors to mimic the HRSP documentation (print or online) to take advantage of energy consumers in Ontario. This is a genuine concern of the IESO, which has already had its HRSP website mirrored by a third party without permission.
- *Cybersecurity Information*: Disclosure of the cybersecurity protocols could harm the IESO’s ability to manage cybersecurity incidents related to the HRSP, and potentially other IESO initiatives, as the schedule was negotiated using the IESO’s standard security schedule and this template is used with IESO service providers.
- *Numerical Information*: Much of the redacted numerical information (insurance coverage and liability limits, set-up expense contribution percentages, and illustrative cost sharing information) includes, or could be used to determine, the unit pricing of the IESO’s service providers or the ratio of administrative versus

incentive budgets. If disclosed, this information could prejudice the IESO in future negotiations and competitive procurement processes for similar or related services. The IESO believes that this could adversely impact the IESO's ability to procure goods and services for the HRSP, or other initiatives, since prospective proponents would have access to prior pricing information that would not otherwise have been made available in the normal course.

Greener Homes Grant Program Agreement ("GHGPA"): In its correspondence to the OEB, Pollution Probe and the SEC argue that the Agreement is similar to the GHGPA, which the OEB required disclosure of in EB-2021-0002. The IESO's understanding is that the GHGPA is fundamentally different than the Agreement. The GHGPA provided federal funding for Enbridge Gas to be the exclusive delivery agent in Ontario for the Canada Greener Homes initiative. In contrast, the HRSP involves the IESO and Enbridge Gas jointly developing, administering and funding programs targeted at eligible residential electricity, natural gas and non-regulated fuel consumers in Ontario. The IESO's role in the HRSP is being undertaken pursuant to Ministerial Directive 1448/2024 to the IESO dated November 7, 2024 (as amended). The content of the Agreement is substantially different than the GHGPA, and jointly developed by Enbridge Gas and the IESO. Consequently, the OEB's decision on the disclosure of the GHGPA provides no precedential value in connection with the confidentiality request related to the Agreement in this proceeding.

Sincerely,



Carrie Aloussis
Senior Manager, Regulatory Affairs

cc: Haris Ginis (Enbridge Gas)
Dennis O'Leary (Aird & Berlis, counsel to Enbridge Gas)
Lawren Murray (OEB Counsel)
Michael Bell (OEB Staff)
Richard King (Osler, Hoskin & Harcourt, counsel to IESO)
All Intervenors in EB-2024-0198