



Enbridge Gas Inc.

**Application for Multi-Year Natural Gas Demand Side
Management Plan (2026-2030)**

**PROCEDURAL ORDER NO. 6
August 18, 2025**

Enbridge Gas Inc. (Enbridge Gas) filed a multi-year natural gas demand side management (DSM) plan application with the Ontario Energy Board (OEB) on November 29, 2024 under section 36(1) of the *Ontario Energy Board Act, 1998*. The application was filed for approval of a new natural gas DSM policy framework effective January 1, 2026 and a new multi-year DSM plan, inclusive of budgets, programs and targets, from January 1, 2026 to December 31, 2030.

On March 20, 2025, Enbridge Gas filed a [letter](#) with the OEB requesting that the OEB place the application in abeyance to allow for the filing of updated evidence in response to the Government of Canada's decision to set the federal carbon charge to zero effective April 1, 2025.

On June 20, 2025, Enbridge Gas requested to roll over the 2023-2025 programs into 2026 and filed updated evidence for its [2026 DSM Plan](#).

On July 3, 2025, the OEB issued [Procedural Order No. 4](#) which, among other things, took the application out of abeyance and established procedural steps for the balance of the proceeding.

On July 18, 2025, the OEB Issued [Procedural Order No. 5](#) which provided findings on certain intervenors' evidence and announced scheduling changes for procedural steps.

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

Technical Conference Undertakings

On August 8, 2025, Enbridge Gas filed its Technical Conference [undertaking responses](#). In accordance with the [OEB's Practice Direction on Confidential Filings](#), Enbridge Gas requested confidential treatment of Exhibit JT1.6, Attachment 1, the Collaboration and Cooperation Agreement between Enbridge Gas and the Independent Electricity System Operator (IESO) for the Home Renovation Savings (HRS) Program, executed July 7, 2025 (the HRS Agreement).

The HRS Agreement is related to the residential one-window program jointly developed and delivered by Enbridge Gas and the IESO. The HRS Program began in early 2025. The HRS Agreement contains provisions dealing with each of Enbridge Gas and the IESO's responsibilities for costs and expenses, amongst other things.

In the cover letter to the undertaking responses, Enbridge Gas indicated that subsequent to the Technical Conference, Enbridge Gas and the IESO reviewed the HRS Agreement in detail to determine if there are elements of the HRS Agreement which either or both believe should appropriately be made the subject of a request for redaction on the basis of non-relevance or confidentiality.

Enbridge Gas stated that in some instances, the request for confidentiality is driven by the commercial sensitivity of the information. Enbridge Gas noted that public disclosure of this information could prejudice negotiations with future suppliers or negatively impact future procurement processes, as interested parties would have inappropriate insight into pricing models, budgets and similar commercially sensitive information.

Enbridge Gas indicated that the information that is the subject of requests for redaction on the basis of non-relevance or confidential treatment has been redacted in the version of the HRS Agreement made publicly available.

Confidentiality Correspondence

On August 12, 2025, the School Energy Coalition (SEC) filed an [email](#) and Pollution Probe filed a [letter](#) with the OEB. SEC requested that the OEB extend the deadline for intervenor submissions until four business days after a determination is made on Enbridge Gas's confidentiality requests. Pollution Probe supported this request. SEC and Pollution Probe each expressed concern that the confidential version of the HRS Agreement remains heavily redacted, despite parties having executed the Declaration and Undertaking. SEC emphasized that Enbridge Gas should not unilaterally determine relevance. Pollution Probe recommended that the HRS Agreement be placed on the public record in full, or at minimum, that Enbridge Gas provide unredacted copies to parties who signed the Declaration and Undertaking.

On August 13, 2025, Enbridge Gas filed a [letter](#) in response to the SEC email and Pollution Probe letter. Enbridge stated that it has complied with the OEB's *Practice Direction on Confidential Filings* and provided confidential copies of the HRS Agreement to SEC and Pollution Probe. Enbridge Gas stated that certain redacted pages were inadvertently included that do not form part of the HRS Agreement. It further asserted that remaining redactions pertain to information irrelevant to its request for approval of its 2026 DSM Plan, such as cybersecurity protocols and HRS style guides, and do not

contain DSM financial or cost-sharing terms. Enbridge Gas reiterated the importance of receiving the OEB's decision by the end of September 2025 and requested that the current schedule for submissions be maintained.

On August 14, 2025, SEC filed a [letter](#) in response to the Enbridge Gas letter. SEC expressed concern that Enbridge Gas is seeking to bypass standard OEB procedures by requesting urgent approval of its confidentiality claims without allowing for submissions from other parties. SEC noted that Enbridge Gas's actions, including late evidence filing and unilateral redactions, have contributed to the current time constraints. SEC emphasized that confidentiality determinations must be made by the OEB following the established process, and that parties must be afforded the opportunity to make submissions based on the complete evidentiary record. SEC opposed any deviation from the OEB's procedural rules due to Enbridge Gas's stated need for urgency.

On August 14, 2025, the IESO filed a [letter](#) in support of Enbridge Gas's request for confidential treatment of portions of the HRS Agreement. The IESO confirmed that the redacted elements were jointly reviewed and deemed non-relevant to the request to roll over the current DSM Plan into 2026 and, in many cases, potentially harmful if disclosed. The IESO stated that redactions include erroneous pages, branding style guidelines, cybersecurity protocols, an incident under investigation, and certain numerical data. The IESO outlined specific risks associated with disclosure, including reputational harm, cybersecurity vulnerabilities, and prejudice in future procurement processes. The IESO also distinguished the HRS Agreement from the previous Enbridge Gas partnership agreement with Natural Resources Canada for the Canada Greener Homes Grant Program (NRCAN Agreement), asserting that the latter involved federal funding and exclusive delivery arrangements, whereas the current HRS Agreement reflects a joint initiative under a Ministerial Directive. The IESO concluded that the prior OEB decision related to the NRCAN Agreement does not apply to the present confidentiality request.

Findings

Having reviewed the proposed redactions, the OEB is of the view that parties who have signed and submitted the Declaration and Undertaking should be provided with the full, unredacted version of the HRS Agreement to allow them to make submissions on the topics of confidentiality and relevance. The OEB agrees with SEC and Pollution Probe that, in the absence of the full, unredacted HRS Agreement, it is not possible for parties to make informed submissions on the reasonableness of Enbridge Gas's requests for confidential treatment and claims of non-relevance. In this case, the OEB believes it

would be helpful to hear from parties before deciding issues of both confidentiality and relevance for the portions of the HRS Agreement that have been redacted.

The areas identified by Enbridge Gas as either confidential or not relevant are protected under the terms of the Declaration and Undertaking. Therefore, there is no prejudice to Enbridge Gas or the IESO in disclosing this information to those parties, and doing so is consistent with the OEB's established confidentiality process. Any submissions made by parties that may reveal information subject to a claim of confidentiality or non-relevance should be filed in confidence with the OEB. Parties are encouraged to ensure that their submissions can be included on the public record and should take steps to avoid explicit reference to certain redacted information unless absolutely required.

The OEB has updated procedural steps to allow parties to file submissions on Enbridge Gas's request for confidential treatment of the HRS Agreement. Parties that wish to make submissions related to Enbridge Gas's request for confidential treatment of certain portions of the HRS Agreement shall be granted access to the unredacted document provided they have executed the OEB's [Declaration and Undertaking](#).

Scheduling Change

The OEB is adjusting some dates established in Procedural Order No. 5 to accommodate submissions on confidentiality. In particular, the submission dates for OEB staff, intervenors and reply by Enbridge Gas are being changed.

The OEB is making provision for the following procedural steps related to this proceeding. Further procedural orders may be issued by the OEB.

THE ONTARIO ENERGY BOARD ORDERS THAT:

1. Enbridge Gas Inc. will immediately provide an unredacted version of the HRS Agreement to intervenors who signed the OEB's Confidentiality Declaration and Undertaking.
2. OEB staff and intervenors who wish to make written submissions on Enbridge Gas Inc.'s redaction requests shall file such submissions with the OEB and serve them on Enbridge Gas Inc. and all other intervenors, by **Wednesday, August 20, 2025**.
3. If Enbridge Gas Inc. wishes to respond to any of the submissions on the redaction requests, its reply submission shall be filed with the OEB and served on all parties by **Friday, August 22, 2025**.

4. Any written submissions on Enbridge Gas Inc.'s application for its 2026 Demand Side Management Plan by OEB staff and intervenors shall be filed with the OEB and served on Enbridge Gas and intervenors by **Wednesday, September 3, 2025**.
5. Enbridge Gas Inc. may file a written reply submission with the OEB and serve it on intervenors by **Friday, September 12, 2025**.

Parties are responsible for ensuring that any documents they file with the OEB, such as applicant and intervenor evidence, interrogatories and responses to interrogatories or any other type of document, **do not include personal information** (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's [Rules of Practice and Procedure](#).

Please quote file number, **EB-2024-0198** for all materials filed and submit them in searchable/unrestricted PDF format with a digital signature through the [OEB's online filing portal](#).

- Filings should clearly state the sender's name, postal address, telephone number and e-mail address.
- Please use the document naming conventions and document submission standards outlined in the [Regulatory Electronic Submission System \(RESS\) Document Guidelines](#) found at the [File documents online page](#) on the OEB's website.
- Parties are encouraged to use RESS. Those who have not yet [set up an account](#), or require assistance using the online filing portal can contact registrar@oeb.ca for assistance.
- Cost claims are filed through the OEB's online filing portal. Please visit the [File documents online page](#) of the OEB's website for more information. All participants shall download a copy of their submitted cost claim and serve it on all required parties as per the [Practice Direction on Cost Awards](#).

All communications should be directed to the attention of the Registrar at the address below and be received by end of business, 4:45 p.m., on the required date.

With respect to distribution lists for all electronic correspondence and materials related to this proceeding, parties must include the Case Manager, Michael Bell at Michael.Bell@oeb.ca and OEB Counsel, Lawren Murray at Lawren.Murray@oeb.ca.

Email: registrar@oeb.ca

Tel: 1-877-632-2727 (Toll free)

DATED at Toronto, **August 18, 2025**

ONTARIO ENERGY BOARD

Ritchie Murray
Acting Registrar