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BY EMAIL

September 3, 2025

Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
[registrar@oeb.ca](mailto:registrar@oeb.ca)

Dear Ritchie Murray:

**Re: Ontario Energy Board (OEB) Staff Submissions  
Enbridge Gas Inc. – Application for a 2026 Natural Gas Demand Side  
Management Plan  
OEB File Number: EB-2024-0198**

In accordance with Procedural Order No. 5, please find attached the OEB staff's submission regarding Enbridge Gas Inc.'s request to extend its current 2023-2025 DSM Plan for one additional year. The attached document has been forwarded to Enbridge Gas Inc. and to all other parties to this proceeding.

Yours truly,

Josh Wasylyk  
Senior Advisor, Application Policy & Conservation

c: All parties in EB-2024-0198

Encl.



# **ONTARIO ENERGY BOARD**

## **OEB Staff Submission**

### **2026 DSM Plan**

**Enbridge Gas Inc.**

**One-year extension of 2023-2025 Natural Gas Demand Side  
Management Plan**

**EB-2024-0198**

**September 3, 2025**

## Background

Enbridge Gas Inc. (Enbridge Gas) originally 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 original application sought approval of modifications to the existing 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.

In response to the Government of Canada's decision to set the federal carbon charge under the *Greenhouse Gas Pollution Act* to zero effective April 1, 2025, Enbridge Gas revised its request and is now seeking approval to extend its 2023-2025 DSM Plan for one year (to the end of 2026) to allow DSM programming to continue while the development and adjudication of Enbridge Gas's new multi-year DSM program application is underway. Enbridge Gas has indicated that it expects to file a complete multi-year DSM plan application in the latter part of 2025 and, if approved, the new multi-year DSM plan would be effective January 1, 2027.

On June 20, 2025, Enbridge Gas filed updated evidence for its 2026 DSM Plan. In response to direction from the OEB issued as part of Procedural Order No. 5, Enbridge Gas and intervenors participated in a technical conference on July 24, 2025 in lieu of written interrogatories. Also, as part of Procedural Order No. 5, the OEB invited written submissions from OEB staff and intervenors on Enbridge Gas's request to extend its currently approved DSM plan for one additional year.

## OEB Staff Submission

OEB staff supports Enbridge Gas's request to extend its currently approved 2023-2025 DSM Plan for one additional year. A one-year extension will maintain program continuity, ensuring that customer awareness and confidence, as well as industry certainty, is maintained.

Consistent with previous directions provided by the OEB as part of its Decision on Issues and Procedural Order No. 2, Procedural Order No. 4 and its letter on August 8, 2025, OEB staff supports a rigorous review of Enbridge Gas's pending multi-year DSM plan application expected to be filed in late-2025. OEB staff expect that the process will and should include a detailed analysis of various components of the proposed DSM plan, such as program design and objectives, measures, incentive levels, delivery channels, educational components, evaluation approaches, cost-effectiveness, and consideration of potential revisions to certain components of the DSM policy framework.

However, that level of review cannot be completed in time for continuation of DSM programming to be in market for January 1, 2026. Further consideration of, or modifications to, Enbridge Gas's future DSM plan in the absence of such detailed analysis would not be adequately informed and therefore made without sufficient evidence. As such, OEB staff's view is that the question before the OEB is whether to continue all, part, or none of Enbridge Gas's current DSM plan while a more detailed review of Enbridge Gas's next multi-year DSM plan takes place. In this context, OEB staff believe the one-year extension requested by Enbridge Gas is reasonable and should be approved to ensure DSM program continuity. If the OEB approves the one-year extension, Enbridge Gas indicated it could file its updated multi-year DSM plan that will come into effect on January 1, 2027 within 60 days of the decision on its 2026 DSM plan. The updated multi-year plan will be subject to a detailed review by intervenors and OEB staff.

## **Policy Context**

Under section 2 of the OEB Act, one of the OEB's objectives is *"To promote energy conservation and energy efficiency in accordance with the policies of the Government of Ontario, including having regard to the consumer's economic circumstances."* In his Letter of Direction to the Chair of the OEB in December 2024, the Minister of Energy and Electrification (now the Minister of Energy and Mines) specified the importance of protecting ratepayer interests, putting customers first by simplifying and improving customer access and experience with energy efficiency programs, while enabling more energy savings and greater emissions reductions. This is to be done while ensuring electricity and natural gas costs remain affordable, stable and predictable. The Minister also indicated his expectation that the OEB will work with Enbridge Gas and the Independent Electricity System Operator (IESO) to deliver a customer-focused one-window platform for energy efficiency programs.<sup>1</sup> The 2024 policy direction builds on expectations included in the Minister's November 2023 Letter of Direction following the launch of the 2023-2025 DSM plan, noting that future DSM programming (post-2026) will continue to prioritize affordability, stability, and deeper energy savings.<sup>2</sup>

More broadly, the Government of Ontario's Report *Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7* (the Integrated Energy Plan) further emphasizes a commitment to energy efficiency, highlighting ongoing support for gas DSM<sup>3</sup> and the importance of integrated gas/electric residential rebate offerings.<sup>4</sup> The Integrated Energy Plan also included confirmation of the approval for a 12-year electricity DSM framework with a total budget of \$10.9 billion and emphasis on

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<sup>1</sup> [Letter of Direction to the OEB, December 19, 2024, pp. 5-6](#)

<sup>2</sup> [Letter of Direction to the OEB, November 29, 2023, pp. 3-4](#)

<sup>3</sup> [Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7](#), p.31

<sup>4</sup> Ibid, p. 33

distributed energy resources.

Consistent with the government's demonstrated commitment to energy efficiency, OEB staff is of the view that a one-year extension of the 2023-2025 DSM Plan will provide stability, continuity and maintain customer awareness and confidence (as well as industry certainty) while a detailed review of Enbridge Gas' multi-year DSM plan application is underway.

Further comments on certain aspects of Enbridge Gas's proposed 2026 DSM plan are provided below.

### **Enbridge Gas's Proposed 2026 DSM Plan**

Enbridge Gas requested approval of its 2026 DSM Plan, which reflects a one-year extension of the OEB-approved 2023 to 2025 DSM Plan,<sup>5</sup> including:

- a) Approval to continue the 2025 DSM programs in 2026, including the Residential Program, the Low-Income Program, the Commercial Program, the Industrial Program, the Large-Volume Program, the Energy Performance Program, and the Building Beyond Code Program.
- b) Approval to include a DSM budget of \$199,797,689 for 2026<sup>6</sup> in rates for 2026, and to continue to use the Deferred Participant Costs mechanism for 2026 for the Whole Building Pay for Performance Offering, the Residential Savings by Design Offering, and the Affordable Housing Savings by Design Offering.
- c) Approval of the DSM scorecards for 2026<sup>7</sup> and of the DSM shareholder incentive mechanism and amounts for 2026.

Enbridge Gas has not requested any modifications to the existing DSM Framework.

### **Budgets, DSM Shareholder Incentive and Performance Scorecards**

Enbridge Gas proposed that the annual budget for the 2026 DSM Plan be based on the final 2025 DSM budget, escalated for inflation.<sup>8</sup> Further, Enbridge Gas proposed that the budget be allocated to rate classes consistent with the budget allocation methodology used for DSM in 2025, previously approved by the OEB in Enbridge Gas's

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<sup>5</sup> [EB-2021-0002, Decision and Order, November 21, 2022](#)

<sup>6</sup> EB-2024-0198, Exhibit B, Tab 1, Schedule 1, Attachment 1, Table 1

<sup>7</sup> EB-2024-0198, Exhibit B, Tab 1, Schedule 1, Attachment 2

<sup>8</sup> EB-2024-0198, Exhibit B, Tab 1, Schedule 1, p. 11. The inflation factor used for the proposed 2026 budget is 2.4%, which is the annual average Consumer Price Index percentage change (not seasonally adjusted).

Rebasing Phase 2 proceeding.<sup>9</sup>

Similarly, Enbridge Gas proposed that the 2026 maximum DSM shareholder incentive amount be based on the OEB-approved methodology<sup>10</sup> used to set the 2025 maximum shareholder incentive, which is increased annually for inflation.

Enbridge Gas also proposed that the same seven scorecards and scorecard design continue for 2026 as were previously approved for 2023-2025. Enbridge Gas proposed to continue applying the target adjustment mechanism where appropriate and that the OEB-approved 2025 fixed targets continue for 2026. Enbridge Gas noted that for programs with fixed targets, the budgets and targets are linked to reflect the specific planned activities for that year, which represent a greater increase than inflation. For simplicity, Enbridge Gas proposed to hold the fixed targets constant.

OEB staff supports each of these proposals as they represent a reasonable continuation of the prior OEB's approvals, will not result in material rate impacts, ensure Enbridge Gas's performance metrics remain consistent with those previously approved, and allow for a reasonable incentive to be earned should Enbridge Gas meet its targets.

### **Program Continuity**

Enbridge Gas proposed extending its 2023-2025 DSM Plan for one year (to the end of 2026) to maintain current energy conservation efforts, including joint residential and low-income programs with the IESO, while the development and adjudication of Enbridge Gas's new multi-year DSM program application is underway and then the new approved program is operationalized. No major changes are proposed to any programs for 2026, beyond natural program evolution informed by evaluations, market conditions, cost-effectiveness, and collaboration opportunities with an intent to increase participation, improve cost-effectiveness or achieve greater natural gas savings.

OEB staff agrees with Enbridge Gas that it is important to maintain program continuity and enable an orderly transition to its next multi-year DSM plan (starting in 2027). Extending the existing DSM plan for an additional year ensures that efforts to raise awareness and educate customers regarding available energy efficiency upgrades and incentives are maintained. For example, Enbridge Gas and the IESO recently launched the Home Renovation Savings offer. This new offer, developed in response to direction from the Minister of Energy,<sup>11, 12</sup> represents a one-window approach for residential programming and enables residential customers in Ontario to access available incentives for energy efficiency upgrades that help reduce natural gas and electricity

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<sup>9</sup> EB-2024-0111, Rate Order, Working Papers, Schedule 10, p. 1, column (b)

<sup>10</sup> EB-2021-0002, Decision and Order, November 15, 2022, p. 60

<sup>11</sup> Letter of Direction from the Minister of Energy to the OEB, November 29, 2023.

<sup>12</sup> Letter of Direction from the Minister of Energy and Electrification to the OEB, December 19, 2024.

consumption and overall energy costs.

If any of Enbridge Gas's current programs were to be stopped, even for a short period of time, there is the potential for long-term negative impacts. This includes cost implications, such as those related to contractual obligations with third party delivery agents (e.g., termination costs, retention risks, re-negotiation costs), IT system and data management costs (e.g., system maintenance may be required on an ongoing basis, potential restart costs, risk of data continuity), workforce and training (e.g., loss of institutional knowledge, energy auditor network disruption), and partnership costs (e.g., contractual obligations, program re-alignment). Cancellation may also reduce customer confidence and increase customer confusion about energy efficiency programming, and reduce demand for and potential loss of various energy efficiency service providers and contractors (potentially extending to distribution networks and manufacturing). Considering current circumstances, extending the current programs and offers for one year represents a reasonable and pragmatic approach to limiting any potential unanticipated negative effects from stopping or pausing programming, while allowing ratepayers to continue to benefit from these programs.

### Cost-Effectiveness

Enbridge Gas provided forecast cost-effectiveness results for its 2025 DSM plan which has an overall Total Resource Cost-Plus test (TRC-Plus) ratio of 1.19.<sup>13</sup> Enbridge Gas indicated that the 2025 forecast should be considered a proxy for 2026 as the programs, if approved, are expected to remain largely unchanged.<sup>14</sup> This includes the following TRC-Plus ratios for each program:

| Program                       | TRC Pass Value | TRC-Plus Ratio     | Pass / Fail |
|-------------------------------|----------------|--------------------|-------------|
| Residential (excluding HER+)* | 1.0            | 0.75               | Fail        |
| Low-Income                    | 0.7**          | 0.83               | Pass        |
| Commercial                    | 1.0            | 1.52               | Pass        |
| Industrial                    | 1.0            | 1.84               | Pass        |
| Large Volume                  | 1.0            | 6.22               | Pass        |
| Energy Performance            | 1.0            | 0.85 <sup>15</sup> | Fail        |

\*Home Energy Rebate Plus offer was the former iteration of Enbridge Gas's residential whole home offer.

\*\*As per the DSM Framework, the low-income program is neither expected nor required to be cost effective.<sup>16</sup>

Notably, even with the removal of the federal carbon charge and associated drop in the

<sup>13</sup> Exhibit C, Tab 2, Schedule 1, p. 4, Table 2

<sup>14</sup> Technical Conference Transcript, Volume 1, p. 175

<sup>15</sup> Letter, Undertaking Responses, August 8, 2025, p. 9

<sup>16</sup> EB-2021-0002, Decision and Order, November 15, 2022, Appendix E, p. 26

benefits derived from avoided carbon costs, the overall portfolio remains cost-effective, as are the Commercial, Industrial and Large Volume Programs. OEB staff supports the Commercial, Industrial and Large Volume programs continuing for 2026. OEB staff also supports the remaining programs (which are not cost effective) continuing in 2026 for the reasons outlined below.

### *Low Income Program*

Of those programs that do not meet a TRC-Plus ratio of 1.0, the Low-Income Program has long been acknowledged by the OEB to likely result in important benefits not captured by the TRC-Plus test and has accepted that it can have a lower threshold value of 0.7.<sup>17</sup> The Low Income Program is forecast by Enbridge Gas to have a TRC Plus ratio 0.83. As such, OEB staff supports continuing the Low-Income Program.

### *Energy Performance Program*

The Energy Performance Program has a forecast TRC-Plus ratio of 0.56. Enbridge Gas noted that the program, which includes only the Whole Building Pay-for-Performance offer, remains consistent with the originally approved version. The objective of the program is a comprehensive, multi-year approach to energy management where participants are supported in achieving reductions in consumption of 20% below the established baseline.

The Energy Performance Program has a 2026 budget of \$1.3 million, which represents less than 0.7% of the overall DSM plan budget. When initially approved, the OEB acknowledged that this was a new program with uncertainty related to the level of natural gas savings from operational improvements and that there is merit in exploring its impacts through metered data.<sup>18</sup> Draft results for the 2024 program year were positive. Enbridge surpassed both the participant and natural gas savings metrics, with 27 participants enrolled (target: 25) and draft natural gas savings of 276,138 m<sup>3</sup> (target: 125,000 m<sup>3</sup>).<sup>19</sup> Further, given the multi-year nature of the program, an extension would allow it to continue without any disruption and enable customers previously enrolled to continue pursuing and realizing benefits. Finally, a one-year extension will provide an additional year of data related to the impact of operational improvements and help inform future decisions about the long-term viability of the program. As such, OEB staff supports the continuation of the Energy Performance Program for 2026.

Enbridge Gas proposed to increase the natural gas savings metric in 2026, consistent with the manner in which the 2024 and 2025 fixed natural gas savings targets were set. This will result in a 2026 natural gas savings target of 375,000 m<sup>3</sup>. OEB staff supports

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<sup>17</sup> EB-2021-0002, Decision and Order, November 15, 2022, Appendix E, p. 26

<sup>18</sup> EB-2021-0002, Decision and Order, November 15, 2022, p. 46

<sup>19</sup> [Enbridge Gas Inc. 2024 Draft DSM Annual Report, April 1, 2025](#), p. 47, p. 57



the proposed update to the performance scorecard as it represents a reasonable increase considering the nature of the program and that the budget is only increasing for inflation.

### *Residential Program*

The Residential Program accounts for approximately 40% of the overall DSM plan budget with a proposed 2026 budget of \$86.6 million. The program has a forecast TRC-Plus ratio of 0.75, notably below the target TRC-Plus ratio of 1.00.

Enbridge Gas is proposing to continue the Residential program in 2026, including each of the Whole Home offer, Single Measure offer and Smart Home offers, in the same manner that they are currently available through the joint Enbridge Gas-IESO Home Renovation Savings Program. Enbridge Gas has maintained the target market, eligibility criteria, performance metrics and gross natural gas savings measurement methodologies initially approved for the 2023-2025 DSM plan.

The Residential Program has seen changes since its initial implementation (in 2023) in response to customer participation and changing program partnerships. The current iteration of the program includes some changes from what was initially approved, including moving electric heat pumps into the single measure offer (and out of the whole home offer) to streamline delivery and provide more predictable savings values, revisions to eligible heat pump incentives to try and drive meaningful natural gas savings, and the addition of post-purchase retail incentives when a customer purchases a qualifying smart thermostat.<sup>20</sup>

Enbridge Gas noted that despite the expectation that the 2026 Residential DSM Program will result in a TRC-Plus ratio of less than 1.0, the overall DSM portfolio (all programs combined) remains cost-effective. Also, program improvements are expected in 2026, including the removal of some cost ineffective components from the previous HER+ program delivered in partnership with Natural Resources Canada, which may improve cost-effectiveness.

Enbridge Gas indicated there is a high level of uncertainty associated with the 2025 forecasts.<sup>21</sup> This is largely driven by the unknown impact of the removal of the federal carbon charge on customer response, unknowns regarding the operating conditions of electric heat pumps, and the limited data related to customer participation in the new Home Renovation Savings program.

OEB staff supports the continuation of Enbridge Gas's Residential Program for 2026. Although it is not forecast to achieve a TRC-Plus ratio above 1.0, the broader portfolio

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<sup>20</sup> Exhibit C, Tab 3, Schedule 1, pp. 9-11

<sup>21</sup> Exhibit C, Tab 2, Schedule 3, p. 5

remains cost-effective. This is important and enables the OEB to consider the merits of the Residential Program, consistent with the OEB's policy guidance regarding cost-effectiveness. At Section 10.3 of the DSM Framework, it states:

“Some programs, although beneficial when reviewed from a broader perspective, may not pass a cost-effectiveness screening threshold of 1.0. The [OEB] will consider these programs on a case-by-case basis. To recognize that all programs may not pass the TRC-Plus test, the utility should ensure its overall DSM portfolio has a TRC-Plus ratio of 1.0 or greater.”<sup>22</sup>

Additionally, it's informative that the Program Administrator Cost (PAC) test exceeds 1.0. In the past, the PAC test has been recognized by the OEB as a useful secondary cost-effectiveness screening tool.<sup>23</sup> The PAC compares the costs and benefits from the utility perspective, evaluating whether the cost of delivering natural gas savings through DSM programs is lower than the cost of acquiring equivalent energy from traditional supply-side resources. A PAC ratio of 1.0 indicates that the program is cost-effective for the utility system. However, because the PAC test excludes participant costs, programs with high upfront equipment costs – such as cold climate air source heat pumps – may not pass the TRC test, which includes both utility and participant costs, but may still pass the PAC test.

It is also important to consider cost-effectiveness analysis more generally. The tests are an important assessment mechanism to help ensure prudent use of ratepayer funding. However, there are some limitations to the TRC-Plus ratios as some of the data inputs are based on assumptions and early-stage program information. That is particularly relevant for the forecasted 2025 and 2026 cost-effectiveness results. Enbridge Gas has acknowledged that it does not yet know how many consumers will enroll in its Single Measure offer and install a heat pump or how they will operate the equipment.<sup>24</sup> Currently, Enbridge Gas assumes that customers will use electric heat pumps sized for cooling (referred to as the 4A model) and switch over to their natural gas furnace at 6 degrees Celsius. Based on this, Enbridge Gas has used an annual natural gas savings assumption of 179 m<sup>3</sup> per unit. However, if customers operate the same heat pump to 0 degrees Celsius, annual natural gas savings could increase to approximately 760 m<sup>3</sup> per unit.<sup>25</sup> This highlights the sensitivity of cost-effectiveness results to operating behaviour, and underscores the importance of robust customer education and performance monitoring.

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<sup>22</sup> EB-2021-0002, Decision and Order, November 15, 2022, Appendix E, pp.30-31

<sup>23</sup> EB-2014-0124, Report of the Ontario Energy Board, Demand Side Management Framework for Natural Gas Distributors (2015-2020), December 22, 2014, p. 33

<sup>24</sup> Technical Conference transcript, Volume 1, p. 30, line 23 to p. 31, line 23

<sup>25</sup> Exhibit C, Tab 2, Schedule 2, pp. 6-8

Enbridge Gas also discussed the planned inclusion of attic insulation as part of the Single Measure offer. This would eliminate the need for interested participants to undertake pre- and post-installation energy assessments and the requirement to install multiple measures. This streamlined approach is expected to reduce participation barriers and make installing attic insulation more accessible. As a result, customer uptake in the Single Measure offer may increase, while participation in the more complex Whole Home offer could decline. Given that the Single Measure offer – Attic has a forecasted TRC-Plus ratio of 0.97, compared to 0.61 for the Whole Home offer, a shift in participation would likely improve the TRC-Plus ratio for the Residential Program as a whole.<sup>26</sup> This outcome would enhance cost-effectiveness of the Residential Program.

There are several other important variables that warrant more detailed consideration than is possible in this rollover proceeding, but which could improve cost-effectiveness, including:

- Incremental cost of heat pumps – lower equipment and installation costs would directly improve cost-effectiveness outcomes.<sup>27</sup>
- Free ridership rates – current assumptions for heat pumps rely on proxy values. If actual free ridership is lower than assumed, net savings would increase, improving TRC-Plus results.
- Discount rate – a lower discount rate in net present value calculations would enhance the valuation of long-term benefits, positively impacting cost-effectiveness.
- Technology improvements – advancements in heat pump performance, particularly higher coefficients of performance (COP), would increase energy savings and efficiency.
- Evaluation methodology – the final approved approach to allocating costs and benefits between Enbridge Gas and the IESO will influence program-level cost-effectiveness.<sup>28</sup>
- Carbon benefits – reintroducing avoided carbon emissions into the TRC-Plus test would materially improve the benefit-cost ratio.
- New measures – consideration of introducing new equipment, such as air-to-water heat pumps or window-mounted units for multi-residential buildings could expand reach and improve portfolio performance.
- Measure uptake – shifting focus away from lower-performing measures (e.g., windows and doors) toward higher-impact technologies could improve overall

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<sup>26</sup> Technical Conference Transcript, Volume 1, pp. 177-178

<sup>27</sup> Ibid, pp. 178-179

<sup>28</sup> Ibid, pp. 180-181

program efficiency.

Given timing constraints, OEB staff is of the view that the core question before the OEB is not whether the program is perfect, but which path – extension, cancellation, or modification of the program based on the limited information available – is most appropriate. Cancellation would disrupt a program that continues to deliver system benefits, risks undermining customer engagement, and may have negative medium-to-long term impacts on the residential energy efficiency market and programs generally. Making revisions without adequate discovery could compromise program integrity and effectiveness. In contrast, an extension provides continuity, allows time for discovery and evidence-based improvements (via the subsequent multi-year DSM plan proceeding), and avoids unintended negative consequences.

### **Consumer Education**

Enbridge Gas provided information on the Home Renovation Savings Program website which includes a disclaimer regarding the potential consumer operational economics of electric cold climate air source heat pumps. This has been done to ensure residential customers are fully informed when making energy efficiency decisions for their home.<sup>29</sup>

As part of its recent rebasing proceeding, Enbridge Gas indicated it may, in the future, consider the inclusion of relative cost-effectiveness comparisons of natural gas heating versus heating with other energy technologies such as, but not limited to, electric cold climate heat pumps.<sup>30</sup>

To support informed customer decision-making and safeguard prospective participants from unintended outcomes, OEB staff recommends that the OEB provide guidance to Enbridge Gas related to its customer education efforts, particularly as they relate to heat pumps. The focus of these efforts should be to ensure current materials are accessible, clear, factually accurate and that they help customers understand the full costs and benefits before making investment decisions, including the likely impact on participants' total energy (gas and electric) costs.

Ideally, these resources would be reviewed and updated, where appropriate, in collaboration with the IESO, with updates and additional educational materials to be included in Enbridge Gas's updated multi-year DSM plan application. To maximize their usefulness, consideration should be given to the following:

- transparent cost comparisons, including equipment, installation, operating costs, and available rebates
- performance-based guidance, such as heat pump sizing tools, installation

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<sup>29</sup> Exhibit C, Tab 2, Schedule 2, p. 10 and Attachment 1

<sup>30</sup> EB-2025-0064, Exhibit 1, Tab 16, Schedule 1, p. 2

examples, and information on optimal switch over temperatures

- scenario-based calculators to enable customers to calculate annual energy savings, payback periods, emissions reductions and sensitivity to fuel prices
- where, when, and how this information is brought to customers' attention (e.g., consideration of placement on the website, highlighting items that may be included in a participant agreement form, etc.).

In addition, it is critical that delivery partners – including energy advisors, service organizations, and HVAC contractors – are equipped with consistent, accurate, and up-to-date information. OEB staff recommends that Enbridge Gas also review delivery partner education and training materials in collaboration with the IESO, and include these materials as part of its updated multi-year DSM plan application. This will help ensure that all parties involved in customer engagement are aligned and able to support customers in making informed, confident decisions.

All of which is respectfully submitted