

BY EMAIL and RESS

September 3, 2025

Mr. Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Mr. Murray:

EB-2024-0198 Enbridge Gas Inc. Application for a 2026 Natural Gas Demand Side Management Plan - Building Owners and Managers Association Toronto's (BOMA Toronto) Submissions

Introduction

Enbridge Gas Inc. (EGI) filed a five-year natural gas demand side management (DSM) plan application on November 29, 2024, seeking the Ontario Energy Board's (OEB) approval for a new natural gas DSM policy framework, including budgets, programs and targets effective January 1, 2026 to December 31, 2030.

On March 20, 2025, EGI requested that the OEB place this 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, EGI requested to roll over the 2023-2025 programs into 2026 and filed updated evidence for its 2026 DSM Plan. EGI stated that this one-year extension would allow DSM programming to continue in 2026 with no interruption. In the latter part of 2025, EGI will file a complete multi-year DSM plan to be effective January 1, 2027.

BOMA Toronto Submissions

BOMA Toronto supports extending all EGI's currently approved 2023-2025 DSM programs into 2026.

DSM Program Continuity and Rate Impact

Discontinuity in DSM programs is costly and inefficient (ramp-down and ramp-up). It creates disruption and uncertainty that would negatively impact customers' energy costs and the progress to meet the emission reduction targets set by the government.

In addition, the incremental rate impact associated with EGI's proposal to extend the 2023-2025 DSM program into 2026 is not significant and it further supports this roll-over application.

Timing of the 2027-2031 DSM Application

The development of a new, more effective multi-year DSM plan has already been delayed by one year. BOMA Toronto submits that the OEB should approve this roll-over application without further delay and that would allow EGI to file its new multi-year DSM plan as soon as possible.

BOMA Toronto expects improved and more effective DSM programs to be proposed in EGI's new 2027-2031 DSM plan and it is vital to leave time for full consideration of the additional programming that can help meet the province's emission targets.

Respectfully submitted on behalf of BOMA Toronto,



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