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From: Ontario Energy Board <webmaster@oeb.ca>
Sent: Friday, September 26, 2025 5:20 PM
To: Office of the Registrar <Registrar@oeb.ca>
Subject: Redacted - Letter of Comment - EB-2024-0198

-- Name --

Afshin Amirpoor Daylami

-- Do you reside in the impacted service area? -- Yes

-- Comments --

Dear Ontario Energy Board Members,

I am submitting this formal objection regarding Enbridge's DSM Application #EB-2024-0198. I write not only as a Service Organization (SO) manager who has been excluded from the current program structure despite being fully qualified, but also as a representative of broader industry stakeholders who are directly impacted by the lack of fairness and transparency in Enbridge's administration of these programs.

This application, in its current form, should not be approved. The reasons are clear, serious, and directly tied to the OEB's mandate to protect the public interest.

1. Misalignment with Ratepayer Interests Enbridge seeks \$49 million in 2026 for 12,000 participants, alongside \$7.8 million for attic insulation programs serving 6,000 participants. These funds are entirely ratepayer-funded. Yet there is no evidence that these inflated costs deliver commensurate value. Approving such an increase without accountability would fail to uphold the Board's responsibility to safeguard ratepayer interests.

2. Market Manipulation and Anti-Competitive Practices By reducing participation to only 4 Service Organizations (from 8) and 6 insulation contractors, Enbridge has engineered an artificial oligopoly. This limits competition, inflates costs, and restricts homeowner choice. Such practices are contrary to principles of fair market access and are directly inconsistent with the competitive frameworks endorsed by the IESO.

3. Lack of Transparency and Oversight

Concerns already raised by intervenors (CCMBC, EP, Pollution Probe) confirm what many in the industry know: Enbridge's opaque selection process is a key reason why DSM program costs appear disproportionately high. Allowing the program to continue unchanged into 2026 would mean condoning this lack of transparency.

4. Equity and Discrimination Concerns

Qualified organizations—including those operated by visible minority and Indigenous owners—have been excluded without a transparent process. This raises serious questions of equity, fairness, and potential systemic discrimination, in stark contrast to the values that Enbridge claims to uphold. The Board risks tacitly endorsing exclusionary practices if this application is approved without reform.

5. Inefficient and Wasteful Spending

The continuation of Enbridge's internal marketing budget is indefensible when contractors and SOs are fully capable of marketing their services at their own expense. This duplication of cost is a direct waste of ratepayer dollars.

Requested Actions by the OEB:

I strongly urge the Board to:

- Reject Enbridge's application in its current form.
- Require Enbridge to open participation to a broader and more representative pool of SOs and contractors.
- Mandate a transparent, objective, and equitable selection process that eliminates bias and preferential treatment.
- Ensure visible minority and Indigenous-run organizations are given fair access.
- Remove Enbridge's marketing spend and redirect savings to program delivery.
- Conduct an independent review to determine whether the IESO should assume delivery of all residential DSM

programs if Enbridge cannot demonstrate compliance with fairness and cost-effectiveness requirements.

Conclusion

Approval of this application, as submitted, would represent a failure of regulatory oversight and a disservice to the very ratepayers the OEB is mandated to protect. This is a defining moment: either the Board requires transparency, fairness, and accountability from Enbridge, or it risks undermining confidence in the DSM framework for years to come.

Please include this letter in the official public record of comments for EB-2024-0198 (Enbridge Gas Inc. 2026–2030 DSM Plan).

Respectfully,
Afshin Daylami