Ontario Energy Board | Commission de l'énergie de l'Ontario

DECISION AND ORDER

EB-2024-0198

ENBRIDGE GAS INC.

Application for approval of natural gas demand side management plan for 2026

BEFORE: Fred Cass
Presiding Commissioner

Patrick Moran
Commissioner

Vinay Sharma
Commissioner

November 6, 2025

Ontario Energy Board | Commission de l'énergie de l'Ontario

TABLE OF CONTENTS

1 OVERVIEW

This is the Ontario Energy Board's (OEB) Decision and Order on an application filed by Enbridge Gas Inc. (Enbridge Gas) for approval of a one-year extension of its currently approved 2025 natural gas demand side management (DSM) Plan for programming to continue throughout 2026.

For the reasons summarized below and described in greater detail in this Decision and Order, the OEB approves Enbridge Gas's request for approval of its 2026 DSM plan, which is an extension of its 2025 DSM plan, including the following key determinations:

1. All DSM programs will continue for 2026. Enbridge Gas's DSM plan continues to be cost-effective and provides value to participants. To ensure continuity and avoid any unintended consequences, the entirety of Enbridge Gas's DSM plan should continue for one year.
2. The proposed budgets, scorecards and performance incentives should also continue in 2026.
3. The cost-effectiveness of all programs, and in particular, the Residential Program, will require greater examination and consideration as part of Enbridge Gas's multi-year DSM plan application. The OEB expects that Enbridge Gas will provide evidence that demonstrates all efforts it has taken and proposes to take to ensure that all programs will be cost-effective throughout the next multi-year DSM term.
4. There are no changes to the DSM Framework.
5. The OEB is mindful of the impact that the removal of the Federal Carbon Charge may have on the cost-effectiveness calculations applied to Enbridge Gas's proposed DSM programs. The scope of this proceeding was limited to extending the current DSM plan for a further year to allow Enbridge Gas time to update its next multi-year DSM plan for implementation beginning in 2027. Enbridge Gas's pending multi-year DSM plan will be subject to a comprehensive review. Enbridge Gas has been including the federal carbon charge in its TRC-Plus analysis to determine the cost-effectiveness of its DSM programs. Now that the federal carbon charge has been removed, it is still necessary to consider the full economic impact of DSM programs in order to assess their cost-effectiveness and whether it is therefore appropriate for those DSM programs to be supported by ratepayer funding. The federal carbon charge represented an economic cost

of carbon and in its absence, it is necessary for Enbridge Gas to consider how the economic cost of carbon should be reflected in the TRC-Plus analysis of the programs it will propose in its upcoming updated DSM plan application.

2 CONTEXT AND PROCESS

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

A Notice of Hearing was issued on December 19, 2024. The following organizations applied for intervenor status:[1]

- Building Owners and Managers Association (BOMA)*
- Canadian Manufacturers & Exporters (CME)*
- Coalition of Concerned Manufacturers and Businesses of Canada (CCMBC)*
- Consumers Council of Canada (CCC)*
- Energy Probe Research Foundation (Energy Probe)*
- Environmental Defence (ED)*
- Federation of Rental-housing Providers of Ontario (FRPO)*
- Green Energy Coalition (GEC)*
- Housing Services Corporation (HSC)
- Independent Electricity System Operator (IESO)
- Industrial Gas Users Association (IGUA)*
- Low-Income Energy Network (LIEN)*
- Minogi Corp.*
- Ontario Greenhouse Vegetable Growers (OGVG)*
- Pollution Probe*
- School Energy Coalition (SEC)*
- Small Business Utility Alliance (SBUA)*
- Three Fires Group Inc. (TFG)*
- Vulnerable Energy Consumers Coalition (VECC)*

All requests for intervenor status were approved. Parties that additionally requested cost awards are eligible to apply for an award of costs under the OEB's Practice Direction on Cost Awards.

[1] Organizations marked with * denotes a request for cost eligibility

On March 20, 2025, Enbridge Gas filed a letter with the OEB requesting that the OEB place the application in abeyance. This request was for the preparation of updated evidence in response to the Government of Canda's decision to set the federal carbon charge under the *Greenhouse Gas Pollution Act* to zero effective April 1, 2025. Enbridge Gas proposed filing the updates no later than May 30, 2025. The OEB granted the request by letter dated March 24, 2025.

As part of the OEB's Decision on Issues List and Procedural Order No. 2 issued on April 10, 2025, the OEB provided direction to Enbridge Gas on its abeyance request, including a requirement that Enbridge Gas report on its preparation of the updates by May 2, 2025.

Enbridge Gas filed a letter on May 2, 2025. Enbridge Gas indicated it would file an update by May 30, 2025, requesting that the OEB roll forward the approved 2023-2025 DSM Plan to the 2026 program year. Enbridge Gas indicated that it would also seek a decision on its 2026 DSM activities by September 30, 2025 to avoid any program disruptions.

On May 13, 2025, the OEB issued Procedural Order No. 3 which, among other things, directed Enbridge Gas to file additional evidence relating to its DSM plan for 2026. On May 23, 2025, Enbridge Gas filed a letter with the OEB requesting an extension to file its evidence update from May 30, 2025 to June 20, 2025. Enbridge Gas indicated that it required more time to provide the additional evidence required by the OEB.

On May 28, 2025, the OEB issued a letter and accepted Enbridge Gas's request for an extension to June 20, 2025.

On June 20, 2025, Enbridge Gas requested to roll over the 2023-2025 programs into 2026 and filed updated evidence for this 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.

On August 8, 2025, Enbridge Gas filed its Technical Conference undertaking responses. In accordance with the OEB's *Practice Direction on Confidential Filings* (Practice Direction), Enbridge Gas requested that portions of its technical conference undertaking response, Exhibit JT1.6, be redacted on the basis of either non-relevance or confidentiality.

On August 18, 2025, the OEB issued Procedural Order No. 6 which, among other things, provided dates for filing submissions on Enbridge Gas's requests for redactions and revised dates for the filing of submissions on the 2026 DSM Plan.

On August 29, 2025, the OEB issued the Decision on Confidentiality and Procedural Order No. 7. The Procedural Order made provision for Enbridge Gas to refile the Home Renovation Savings (HRS) Agreement and stated that if Enbridge Gas and the IESO enter into a new or amended HRS Agreement, Enbridge Gas shall file it with the OEB immediately.

OEB staff and intervenors filed their written submissions on the request to roll forward the approved 2023-2025 DSM Plan by September 3, 2025.

Enbridge Gas filed its reply submission on September 12, 2025.

3 DECISION OUTLINE

Each of the following areas of Enbridge Gas's DSM plan is addressed in this Decision and Order, together with the OEB's findings.

- 2026 DSM Plan and Programs
- 2026 DSM Budget
- 2026 DSM Scorecards, Targets and Shareholder Incentive
- Transition to Enbridge Gas's 2027+ Multi-Year DSM Plan Application

4 DECISION

4.1 2026 DSM Plan and Programs

Enbridge Gas proposed to roll forward its current DSM plan, including all the DSM programs available in 2025, into 2026, resulting in a one-year extension of the OEB approved 2023-2025 DSM Plan with no modifications to the existing DSM Framework. This proposal came after the Government of Canada announced that it was setting the federal carbon charge to zero on April 1, 2025. This required Enbridge Gas to consider the impact that removing the federal carbon charge would have on its multi-year DSM plan application. Upon review, Enbridge Gas informed the OEB that the impact of the removal of the federal carbon charge was broad and would require more time than it had initially expected to reconsider its multi-year DSM plan application. As a mitigating measure, Enbridge Gas requested approval to extend its previously approved 2023-2025 DSM plan for one year. This would ensure program continuity over 2026 and allow for a comprehensive review of its multi-year DSM plan application in the latter part of 2025 and into 2026 for implementation in 2027.

Parties broadly supported Enbridge Gas's proposal for its 2025 DSM plan and programs to continue in 2026. Parties noted that the DSM plan as a whole continues to be cost effective (Total Resource Cost-Plus estimate of 1.02) and provide value and important opportunities for customers. Parties largely agreed that it was important to approve the extension to ensure program continuity, allow customers to continue making energy efficiency improvements and continue joint programming with the IESO.

Many parties commented on the proposed Residential Program. Parties shared a similar view that the Residential Program presented a unique challenge in this proceeding, as it is estimated to have a TRC-Plus value of 0.62. The TRC-Plus test measures the total resource cost of a program, including a 15% adder for non-energy benefits.

ED, GEC and OEB staff highlighted that key changes to certain assumptions that inform cost-effectiveness can lead to improvements, including the assumption of when heating equipment changes from an electric heat pump to a natural gas furnace. Additionally, they noted that the Residential Program is cost-effective under the Program Administrator Cost (PAC) test, with a benefit-cost ratio of 1.12. The PAC test has been relied on by the OEB in the past as a secondary cost-effectiveness screening tool and evaluates cost-effectiveness from the utility's perspective. Enbridge Gas also highlighted the positive PAC result of the Residential Program, and use of the PAC test by the IESO when screening its programs, in support of the OEB approving the one-year extension.

Parties, including CME, BOMA, CCC, and OEB staff, also noted that it is reasonable to extend the Residential Program for one year to avoid expected wind-down/ramp-up costs associated with cancelling, and then potentially restarting, the Residential Program.

SEC highlighted that recent Ministerial Directives to the OEB regarding natural gas energy efficiency programs emphasize emissions reductions and energy affordability, rather than cost-effectiveness. In light of these policy objectives, SEC recommended that the OEB revise the cost-effectiveness test applied to the Residential Program. Specifically, SEC proposed increasing the non-monetary benefits adder in the TRC-Plus test from 15% to approximately 65%, reflecting the value of the former Federal Carbon Charge. SEC argued that, even in the absence of direct evidence on total non-monetary benefits in this proceeding, such an adjustment would align with government policy and render the Residential Program cost-effective under a revised cost-effectiveness test. FRPO, LIEN and VECC expressed support for this proposal.

IGUA, Energy Probe and ED iterated that consideration of an OEB determined social cost of carbon is out of scope in this proceeding and more appropriately addressed as part of the OEB's consideration of Enbridge Gas's multi-year DSM plan application. Enbridge Gas concurred with these submissions in its reply and agreed that SEC's proposal was out of scope.

Energy Probe and CCMBC argued that DSM programs with a TRC-Plus ratio below 1.0 should be phased out by the end of 2025 and not carried forward into 2026, including the Low-Income Program. With respect to residential offerings, they identified the Residential Smart Home program as the only program demonstrating positive net benefits and achieving a TRC-Plus ratio above 1.0. Accordingly, they recommended that this program be the sole residential offers eligible for the rollover to the 2026 program year. Enbridge Gas argued that Energy Probe and CCMBC's arguments are based on erroneous interpretations of the DSM Framework. As an example, the DSM framework specifically acknowledges and accepts the TRC-Plus ratio of less than 1.0 for the Low-Income Program; thus making this area of the submissions out of scope. Regarding the Residential Program, Enbridge Gas stated that the DSM Framework indicates that where a program does not have an expected TRC-Plus ratio of greater than 1.0, it will still be considered on a case-by-case basis when the overall DSM plan has an expected TRC-Plus ratio of 1.0 or greater, which is applicable in this application.

The majority of parties either supported or did not oppose the extension of all other DSM programs, including the Commercial, Industrial, Large Volume, and Energy Performance programs, into the 2026 program year.

In its reply submission, Enbridge Gas reiterated that the 2026 DSM Plan should be approved as filed, consistent with the strong support from parties. Further, Enbridge Gas submitted that any discontinuation or material reduction to the Residential Program would be inconsistent with the Minister of Energy’s letters of direction to the OEB dated December 19, 2024, November 29, 2023, and October 21, 2022, all of which promote natural gas conservation and specifically reference the one-window program being jointly undertaken by Enbridge Gas and the IESO.

Findings

The OEB approves the proposed rollover of Enbridge Gas’s 2025 DSM plan and programs for the 2026 program year.

Although the cost-effectiveness of Enbridge Gas’s Residential Program falls short of meeting the TRC-Plus test, all parties, except for CCMBC and Energy Probe, supported the approval of the rollover proposal. The DSM portfolio as a whole has a TRC-Plus ratio of greater than 1.0, consistent with the provision of the DSM Framework which states that the utility should ensure that its overall DSM portfolio has a TRC-Plus ratio of 1.0 or greater.[2]

Further, the DSM Framework states that individual programs which are beneficial but do not pass a cost-effectiveness screening threshold of 1.0 will be considered by the OEB on a case-by-case basis. In the particular circumstances of this rollover application, the OEB accepts the Residential Program for continuation in 2026. The Residential Program passes the PAC test, which has been relied on by the OEB in the past as a useful secondary screening test. Approval of the Residential Program ensures continuation of important incentives to allow customers to improve the energy efficiency of their homes. Continuation of the Residential Program will avoid disruption to DSM activities in advance of the OEB’s consideration of Enbridge Gas’s upcoming multi-year DSM application, including potential wind-down/ramp-up costs and reduced certainty and clarity for customers and service organizations.

[2] EB-2021-0002, Schedule E, DSM Framework, p. 31

The OEB does not approve any alterations to the cost-effectiveness test as proposed by SEC, in particular an adjusted TRC-Plus adder value of 65% to represent an estimate of avoided carbon charges. Consideration of such an adder is beyond the scope of this proceeding and is not supported by the evidentiary record.

Enbridge Gas has been including the federal carbon charge in its TRC-Plus analysis to determine the cost-effectiveness of its DSM programs. Now that the federal carbon charge has been removed, it is still necessary to consider the full economic impact of DSM programs in order to assess their cost-effectiveness and whether it is therefore appropriate for those DSM programs to be supported by ratepayer funding. The federal carbon charge represented an economic cost of carbon and in its absence, it is necessary for Enbridge Gas to consider how the economic cost of carbon should be reflected in the TRC-Plus analysis of the programs it will propose in its upcoming updated DSM plan application.

4.2 2026 DSM Budget

Enbridge Gas proposed to roll forward the 2025 DSM budgets into the 2026 program year, representing a one-year extension of the OEB-approved 2023–2025 DSM Plan. Enbridge Gas requested approval of a DSM budget of $199,797,689 for 2026.[3]

Most parties did not object to the proposed budget. However, SEC raised concern about overspending, noting that the OEB's approval of DSM spending should terminate on December 31, 2026, unless superseded by a new approval. SEC recommended that Enbridge Gas be advised not to seek a further rollover of the current DSM plan. In addition, SEC proposed that the Demand Side Management Variance Account (DSMVA) be made asymmetrical for the 2026 rollover year, disallowing recovery of any overspending while continuing to return any underspending to ratepayers.

CCC recommended a more targeted approach to the DSMVA, suggesting that only the Residential Program should be excluded from recording additional costs in the DSMVA during the 2026 rollover year. This position reflects CCC's concern with cost containment in the absence of a refreshed DSM framework

In its reply, Enbridge Gas stated that continued access to DSMVA funding is consistent with the Government of Ontario's policy objectives and the DSM Framework. It warned that, without access to additional DSMVA funds, the Residential Program may need to

[3] Exhibit B, Tab 1, Schedule 1, pp. 11-12

be suspended mid-year due to funding constraints. Enbridge Gas emphasized that DSMVA funds are limited to participant incentives and cannot be used for overhead costs, thereby providing direct benefits to residential ratepayers.

Findings

The OEB approves a 2026 DSM budget of $199,797,688 as proposed by Enbridge Gas. This budget represents a continuation of the 2025 DSM budget escalated for inflation, consistent with the approved formula for the 2025 DSM budget.

The OEB does not approve any limitations to the DSMVA as proposed by SEC and CCC. Section 12.2 of the DSM Framework outlines the provisions of the DSMVA. The DSM Framework states that any additional funds that may be accessed through the DSMVA are only available after Enbridge Gas meets 100% of its scorecard target on an unverified basis. This ensures that the program has achieved a certain level of natural gas savings and has provided customers with commensurate benefits.

The DSM Framework also states that all additional funding beyond the annual DSM budget must be utilized on incremental program expenses only (*i.e.*, cannot be used for additional overheads). Should Enbridge Gas access any additional funding to continue any of its programs, these amounts must only be used for customer incentives. This ensures that customers continue to receive the benefit of the program without additional costs funding Enbridge Gas's administrative activities.

Further, the DSM Framework states that, when applying for disposition of its DSMVA, "Enbridge Gas will have to provide evidence demonstrating the prudence and cost effectiveness of the amounts spent in excess of the approved annual DSM budget. In considering the prudence of any spending in excess of an approved annual budget, the OEB will consider the information available to Enbridge Gas at the time the program was implemented."[4]

4.3 2026 DSM Shareholder Incentive and Performance Scorecards

Enbridge Gas proposed to set the 2026 maximum shareholder incentive amount using the same OEB-approved methodology applied to the 2025 DSM Plan. The proposed maximum shareholder incentive for 2026 is $23,748,328.[5]

[4] EB-2021-0002, Schedule E, p. 35
[5] Exhibit B, Tab 1, Schedule 1, p. 15

Enbridge Gas also proposed to maintain the same seven scorecards and scorecard design for 2026 as were approved by the OEB in its 2023-2025 DSM Plan Decision, including continuing to use the Target Adjustment Mechanism where relevant and to carry forward the same fixed targets from 2025 into 2026 for the Energy Performance Program participant metric and the Building Beyond Code Program. Enbridge Gas proposed that the Energy Performance Program net annual gas savings metric be increased in the same manner as it was in 2025, as the program involves engagement from participants over multiple years.

While most parties did not oppose the proposal, SEC argued that Enbridge Gas should not be eligible to earn shareholder incentives for DSM programs delivered or results achieved during the 2026 rollover period. CCC recommended that the Residential Program be excluded from the shareholder incentive mechanism, citing concerns about its expected cost-effectiveness. Energy Probe took the position that shareholder incentives should be revised to reflect OEB decisions, stating that incentives should not be awarded for programs that are discontinued. Energy Probe also argued that any incentive amounts associated with programs not extended into 2026 should be removed and the DSM scorecard adjusted accordingly.

Apart from these specific submissions, no party opposed the continuation of the performance scorecards and targets proposed by Enbridge Gas.

In its reply submission, Enbridge Gas stated that proposals to eliminate or revise the shareholder incentive mechanism fall outside the scope of this proceeding. It noted that any such changes would require a formal amendment to the DSM Framework, which is not contemplated in the current application. Enbridge Gas submitted that this proposal should not be considered at this time.

Findings

The OEB approves the continuation of the DSM shareholder incentive available to Enbridge Gas largely in the manner proposed, including the maximum 2026 DSM shareholder incentive value of $23,748,328[6] and the proposed allocation by scorecard.[7] The OEB acknowledges the concerns about Enbridge Gas earning an incentive when the Residential Program is not expected to be cost-effective. However, it is important to also acknowledge that the Residential Program will continue to deliver important natural

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[6] Exhibit B, Tab 1, Schedule 1, p. 15
[7] Ibid, p. 16

gas savings, which is the only metric in the Residential Program scorecard upon which Enbridge Gas is currently able to earn an incentive.

Although there are concerns over the cost-effectiveness of the program, this is largely a function of a change in circumstances; central to this is the removal of the Federal Carbon Charge. While the OEB expects Enbridge Gas to look for all opportunities to improve the cost-effectiveness of the Residential Program, maintaining the shareholder incentive will, at a minimum, ensure a continued focus on achieving natural gas savings through the joint Enbridge Gas-IESO one-window Residential Program.

The DSM Framework's guiding principles state that "Enbridge Gas should not have a disincentive to coordinate DSM efforts with external energy conservation and carbon reduction initiatives".[8] Further, the DSM Framework indicates that "the amount of shareholder incentive will depend on overall level of natural gas reductions, performance against DSM targets, and will take into consideration the relative difficulty in achieving other objectives and guiding principles Enbridge Gas is expected to achieve."[9] The OEB is satisfied that, as part of a limited proceeding focused on the reasonableness of extending the DSM plan for one year pending an in-depth review of the multi-year DSM Plan, continuing the shareholder incentive for 2026 aligns with the scope of this proceeding and the DSM Framework.

Recognizing the concerns expressed regarding the efficiency of the delivery of the DSM plan, the OEB requires Enbridge Gas to include an incentive structure that includes a stretch factor to incentivize efficiency improvements in the overhead costs of the DSM plan, as part of its upcoming updated 2027+ multi-year DSM plan application.

4.4 Transition to Enbridge Gas's 2027+ Multi-Year DSM Plan Application

The limited scope of this proceeding was highlighted by many parties. Several parties acknowledged the need for the OEB to balance considerations related to specific elements of Enbridge Gas's DSM plan, including cost-effectiveness of the Residential Program and overall natural gas savings, with a timely decision to ensure program continuity and avoid any unintended consequences.

Parties stressed the importance of a detailed and comprehensive review of Enbridge Gas's multi-year DSM plan proposal to ensure that it will continue to meet the OEB's

[8] Ibid, p. 3
[9] EB-2021-0002, Schedule E, p. 4

objectives and provide value to ratepayers. Parties also provided recommendations of interim work and information that Enbridge Gas should be undertaking between now and implementing its next updated DSM plan, expected to start in 2027, including various analyses, evaluation reports and updated reporting on program results.

Minogi Corp. and TFG requested that the OEB encourage Enbridge Gas to fully consult and utilize the Indigenous Working Group (IWG) as part of its development of its comprehensive, multi-year DSM plan application. Enbridge Gas acknowledged in its reply submission that it takes consultation with indigenous groups very seriously and it noted that discussions regarding DSM-related issues take place within the IWG and accordingly, no further direction from the OEB is needed as Enbridge Gas has already made this commitment.

OEB staff recommended that the OEB provide guidance to Enbridge Gas with respect to customer education efforts, particularly as they relate to heat pumps. OEB staff also recommended that Enbridge Gas 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.

Enbridge Gas disagreed with OEB staff’s recommendation and argued that it is not appropriate for the OEB to provide any guidance with respect to where, when and how any education materials and communications are provided to customers. Enbridge Gas indicated that it has always prioritized accuracy and transparency in its communications with all customers. Enbridge Gas stated that such micromanagement is an inefficient and inappropriate means of proceeding and requiring oversight of specific information items/tools would represent an extraordinary and inappropriate regulatory overreach into Enbridge Gas’s day-to-day activities.

Findings

The OEB is mindful of concerns regarding the potential for biased or misleading communications related to cold climate air source heat pumps, and that Enbridge Gas’s communications to customers and program delivery agents may diminish the ability to reach the DSM program objectives. It is critical that performance and cost comparisons are based on accurate assumptions and data. This proceeding has not allowed for a detailed review of Enbridge Gas’s current practices. However, the OEB intends to do so as part of its review of Enbridge Gas's multi-year DSM plan application. When Enbridge Gas files its updated application, it shall include a description of all cost and performance comparisons it intends to use, along with supporting evidence laying out all assumptions and data relied on to make those comparisons.

When Enbridge Gas seeks recovery of its costs associated with delivering the 2026 DSM plan, the OEB will consider the prudence of its approach to delivering the plan, including the nature of the communications it deployed during the delivery of the programs.

In support of its request for approval of any incremental DSM program amounts as part of its future 2026 DSM deferral and variance account application, Enbridge Gas shall explain all efforts it has made to improve the efficiency of the delivery of the 2026 Residential Program.

The OEB provides the following directions regarding the evidence of Enbridge Gas in support of its 2027+ multi-year DSM plan application:

(1) In its evidence on cost-effectiveness, Enbridge Gas shall address how the economic cost of carbon should be reflected in the TRC-Plus analysis of the programs it will propose in its upcoming updated DSM plan application with full supporting rationale.

(2) In its upcoming updated DSM plan application, Enbridge Gas shall propose an updated incentive structure that includes a stretch factor to incentivize efficiency in program delivery and it shall explain all efforts it will make to improve the cost-effectiveness of its proposed DSM programs, including, but not limited to:
   (i) reducing Enbridge Gas's administrative costs and improving the efficiency of DSM program administration; and
   (ii) achieving increased efficiency and cost-effectiveness through Enbridge Gas's collaboration with the IESO;

(3) In its upcoming updated 2027+ multi-year DSM plan application, Enbridge Gas shall include a description of all cost and performance comparisons it intends to use in its communications and training materials, along with supporting evidence laying out all assumptions and data relied on to make those comparisons.

Further, the OEB expects Enbridge Gas to fulfill its consultation responsibilities on a continuing basis and sees no need for specific direction to Enbridge Gas regarding indigenous consultations at this time.

Pollution Probe asked the OEB to direct Enbridge Gas to file the 2027+ multi-year application by the end of October. The OEB does not view such a direction as either necessary or appropriate. Enbridge Gas has indicated that it plans to file the 2027+ application 60 days following the issuance of this decision on the rollover application.

Pollution Probe also contended that the OEB should “officially wind down the intervenor pilot design” outlined in Procedural Order No. 1. A winding down of the approach provided for in Procedural Order No. 1 is not within the scope of the matters that the OEB is considering in this decision regarding the Enbridge Gas DSM plan rollover application.

5 ORDER

THE ONTARIO ENERGY BOARD ORDERS THAT:

1. Enbridge Gas Inc.'s 2026 natural gas demand side management plan is extended for one year, effective January 1, 2026 to December 31, 2026, with the following condition:

   In support of its request for approval of any incremental DSM program amounts as part of its future 2026 DSM deferral and variance account application, Enbridge Gas shall explain all efforts it has made to improve the efficiency of the delivery of the 2026 Residential Program.

2. As part of its updated 2027+ multi-year DSM plan application, Enbridge Gas Inc. shall include the following:

   a) In its evidence on cost-effectiveness, Enbridge Gas shall address how the economic cost of carbon should be reflected in the TRC-Plus analysis of the programs it will propose in its upcoming updated DSM plan application with full supporting rationale.
   b) Enbridge Gas shall propose an updated incentive structure that includes a stretch factor to incentivize efficiency in program delivery and it shall explain all efforts it will make to improve the cost-effectiveness of its proposed DSM programs, including, but not limited to:
      i. reducing Enbridge Gas's administrative costs and improving the efficiency of DSM program administration; and
      ii. achieving increased efficiency and cost-effectiveness through Enbridge Gas's collaboration with the IESO;
   c) Enbridge Gas shall include a description of all cost and performance comparisons it intends to use in its communications and training materials, along with supporting evidence laying out all assumptions and data relied on to make those comparisons.

3. Intervenors shall file with the OEB, and forward to Enbridge Gas Inc., their cost claims by **November 20, 2025**.

4. Enbridge Gas Inc. shall file with the OEB, and forward to intervenors, any objections to the claimed costs by **November 27, 2025**.

5. Intervenors shall file with the OEB, and forward to Enbridge Gas Inc., any responses to any objections for cost claims by **December 4, 2025.**

6. Enbridge Gas Inc. shall pay the OEB's costs incidental to this proceeding upon receipt of the OEB's invoice.

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 the 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 November 6, 2025

ONTARIO ENERGY BOARD

Ritchie Murray

Digitally signed by Ritchie Murray
Date: 2025.11.06 13:01:45 -05'00'

Ritchie Murray
Acting Registrar

SCHEDULE A

DECISION AND ORDER

Enbridge Gas Inc.

EB-2024-0198

NOVEMBER 6, 2025

2026 NATURAL GAS DEMAND SIDE MANAGEMENT PLAN SCORECARD

Schedule A – 2026 Natural Gas Demand Side Management Plan Scorecard

Program and Offering(s)	Metric	DSMSI Allocation	Metric Weighting	Lower Band (75%)[1]	2026 Target (100%)	Upper Band (125%)[1]
Residential Program Scorecard						
Residential Whole Home Residential Single Measure Residential Smart Home	Net Annual Gas Savings (m^3)	22%	100%	TAM x 75%	TAM [3]	TAM x 125%
Low Income Program Scorecard						
Home Winterproofing	Single Family Net Annual Gas Savings (m^3)	22%	50%	TAM x 75%	TAM [3]	TAM x 125%
Affordable Housing Multi-Residential	Multi-Residential Net Annual Gas Savings (m^3)		50%	TAM x 75%	TAM [3]	TAM x 125%
Commercial Program Scorecard						
Commercial Custom Prescriptive Downstream	Large Customer Net Annual Gas Savings (m^3)[2]	22%	50%	TAM x 75%	TAM [3]	TAM x 125%
Direct Install Prescriptive Midstream	Small Customer Net Annual Gas Savings (m^3)[2]		50%	TAM x 75%	TAM [3]	TAM x 125%
Industrial Program Scorecard						
Industrial Custom	Net Annual Gas Savings (m^3)	22%	100%	TAM x 75%	TAM [3]	TAM x 125%
Large Volume Program Scorecard						
Direct Access	Net Annual Gas Savings (m^3)	3%	100%	TAM x 75%	TAM [3]	TAM x 125%
Energy Performance Program Scorecard						
Whole Building Pay For Performance	Number of Participants	1%	50%	19	25	31
	Net Annual Gas Savings (m^3)		50%	281,250	375,000	468,750
Building Beyond Code Program Scorecard						
Residential Savings By Design	Number of Energy Star Homes	8%	15%	2,069	2,759	3,448
	Number of Net Zero Ready Homes		15%	10	13	16
Commercial Savings By Design	Number of Participants		30%	26	34	43
Affordable Housing Savings By Design	Number of Participants		30%	18	25	31
Commercial Air Tightness Testing	Number of Participants		5%	5	7	9
	Number of Qualified Agents		5%	8	10	13

Notes:

1. The calculation of the Upper and Lower Bands of the 100% Targets result in non-integer amounts and the Scorecard Incentive will be calculated based on these precise thresholds.
2. Large commercial customers have a three-year average annual consumption greater than/or equal to 100,000 m^3/yr. Small commercial customers are below 100,000 m^3/yr.
3. The 100% Target is calculated according to the TAM methodology set out in Schedule E, DSM Framework, Section 5.2.