



November 13, 2025

Mr. Ritchie Murray, Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th floor
P.O. Box 2319
Toronto, ON M4P 1E4

via RESS

Dear Mr. Murray,

**Re: ENWIN Utilities Ltd.
Letter of Comment
Consultation on the Regulatory Treatment of Local Electricity Demand-side
Management (Stream 2) Programs
Ontario Energy Board File No.: EB-2025-0156**

On July 23, 2025, the Ontario Energy Board (OEB) initiated a consultation on the regulatory treatment of electricity demand-side management (eDSM) programs delivered by local distribution companies (LDCs) that provide both local and system wide benefits.

The foundation for the consultation was a report filed by the Independent Electricity System Operator (IESO) - LDC eDSM Regulatory Working Group (eDSM Stream 2 Report), which proposed a framework for funding local eDSM programs that provide both system and local distribution benefits. The eDSM Stream 2 Report proposed that Stream 2 Programs would be funded from distribution rates and the Global Adjustment based on the principle of “beneficiary pays”. It also noted that the proposed framework for implementing Stream 2 Programs was intended to build on the OEB’s existing policy documents, including the Non-Wires Solutions (NWS) Guidelines and Benefit-Cost Analysis Framework.

The IESO-LDC eDSM Regulatory Working Group responded to OEB Staff questions about the proposed framework on September 25, 2025. Parties also participated in a transcribed Stakeholder Session on October 8 and 9, 2025.

ENWIN Utilities Ltd. (ENWIN) is pleased to offer the following comments on the proposed framework for the OEB’s consideration.

Comments

Overall, ENWIN is supportive of the proposed framework, as it provides an efficient means to enable the expansion of local eDSM programs that are demonstrated to be cost-effective and provide incremental value to the electricity system. The proposed framework is aligned with recent Ministerial directives, which sought to reduce barriers to LDC energy efficiency program activities, and which supported the concept of beneficiary pays through appropriate cost-sharing between province-wide Global Adjustment and local distribution rates for local eDSM programs.¹

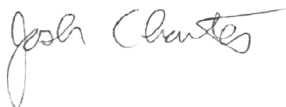
The use of predictable and established processes to review and administer Stream 2 Programs, including the IESO's review of LDCs' proposed programs in advance of OEB filing, the use of Delegated Authority where appropriate to approve LDC Stream 2 Program Applications, and variance accounts for cost tracking, will aid in regulatory efficiency and predictability, removing potential barriers and delays to implementation. The use of established processes will also avoid potential duplication of effort and allow for consistency across the province. The proposal for annual reporting on program status, and ultimate disposition of accumulated eDSM variance account balances in a future proceeding, will provide appropriate opportunities to monitor program status and review prior to final close out.

ENWIN appreciates the opportunity to offer these comments for the OEB's consideration, as well as the collaborative efforts of the IESO - LDC eDSM Regulatory Working Group to arrive at the proposals in the eDSM Stream 2 Report.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,

ENWIN Utilities Ltd.

A handwritten signature in black ink, appearing to read "Josh Charles". The signature is fluid and cursive, with the first name "Josh" and last name "Charles" clearly distinguishable.

Josh Charles, CPA, CA
Director, Regulatory Affairs

¹ Ministry of Energy and Electrification Letter of Direction to OEB, December 19, 2024, p. 6.