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November 17, 2025

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

Dear Mr. Murray,

**RE: EB-2025-0156 Consultation on the Regulatory Treatment of Local Electricity  
Demand-side Management (Stream 2) Programs  
Comments of Energy Probe**

In its letter of July 23, 2025, the OEB announced that it was initiating a consultation on the regulatory treatment of electricity demand-side management programs delivered by local distribution companies that provide both local and system wide benefits. The OEB intends to leverage the electricity DSM Stream 2 Report as a starting point to consider the appropriate regulatory treatment of Stream 2 Programs and invited all interested stakeholders to participate in this consultation process. A stakeholder consultation session was held in October where eDSM Stream 2 Report by the Working Group was presented. Following the session, stakeholders were invited to provide written comments. The following are the comments of Energy Probe Research Foundation (Energy Probe).

Energy Probe generally supports the recommendations of the Working Group. However, Energy Probe has several specific recommendations. Energy Probe recommends that the streamlined approval process under Delegated Authority be limited to programs with the BCR equal to or greater than 1 in the DST. Programs with the BCR less than one should be referred to the Commissioners for approval.

Energy Probe believes that any incremental funding using a rate rider should require a separate application similar to ICM rate rider funding of incremental capital projects.

**Energy Probe Research Foundation** 417 Bloor Street West, Suite 202, Toronto, Ontario, M5S 1X6

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Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: [EnergyProbe@nextcity.com](mailto:EnergyProbe@nextcity.com) Internet: [www.EnergyProbe.org](http://www.EnergyProbe.org)

Energy Probe is concerned that eDSM programs may result in unfair competition between utilities and independent businesses operating in the competitive market behind the meter. Energy Probe suggests that Delegated Authority OEB Staff and Commissioners responsible for review and approval of eDSM programs ensure that monopoly rates are not used to subsidize utility activities in the competitive market.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
Consultant representing Energy Probe

cc. Patricia Adams (Energy Probe)  
Michael Parkes (OEB Staff)