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Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
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DELIVERED BY EMAIL

Dear Mr. Murray,

**Re: Enbridge Gas Inc.
EB-2025-0189
EGI 2023 DSM Deferral and Variance Account Disposition Application**

These are the submissions of the Ontario Greenhouse Vegetable Growers (OGVG) in the above noted proceeding.

OGVG intervened in this application specifically because of the large recovery sought from the M7 rate class.

As detailed in OGVG-1, relative to the DSM amount embedded in M7 2023 distribution rates of \$2,214,083, the incremental DSM funding sought from the class is an additional \$3,164,022, an increase in M7 DSM spending of 143% for the year.

Translated into rate impacts, Enbridge Gas notes at Exhibit B, Tab 3, Schedule 1, Appendix 1 that the recovery from M7 customers ranges from \$175,000 for a “small” customer to \$252,000 for a “large” customer, dwarfing the recovery sought from customers in all other rate classes.

In the face of such a large amount to be recovered from the 70 customers in the M7 class, OGVG intervened in this proceeding to determine whether the increased activity was reasonable.

More specifically, OGVG remains interested in ensuring that, for contract rate customers, Enbridge Gas continues to make reasonable efforts to ensure that as many customers as possible benefit from DSM spending, given the large amount of DSM spending allocated

to the contract rate classes and the relatively small number of customers that bear those costs.

In this instance, as detailed in OGVG-1, it appears that of the 70 customers in the M7 class in 2024, 66 have participated in is DSM programming over the 2021 to 2023 period, with 32 of those customers participating in 2023 alone. Accordingly, it appears to OGVG, Enbridge Gas has been successful in engaging nearly all M7 customers in DSM programming over a relatively short period, with most of those customers engaging in the Industrial and Commercial custom programs.¹

Given the nearly perfect penetration of the DSM programming in the M7 class in the relatively short time frame from 2021-2023, OGVG does not have concerns about the proposed amount to be recovered from the M7 rate class, as all or nearly all M7 customers are experiencing DSM related gas cost savings that at least partially if not entirely offset the annual cost of DSM programming recovered from the class.²

Accordingly, OGVG's only remaining concern in the context of this proceeding is the proposal to recover amounts through a one-time charge which, as noted earlier, can be as high as \$275,000 for a "large" M7 customer. To that point, Enbridge Gas has confirmed in OGVG-1 k) that while it prefers the default proposal to recover DSM amounts through a one-time charge, it can deal with the recovery of the charge over time on a customer specific basis as needed:

Enbridge Gas confirms that it is possible to recover the disposition amounts over several months. However, the Company prefers a customer-specific approach as opposed to a blanket approach for contract rate class customers. Spreading the one-time adjustment over multiple months creates administrative billing complexity, delays potential credits owed to customers for several months, and provides minimal benefit to customers in the rate class with small disposition balances. A customer-specific approach is preferable as the Company can identify accounts that may need billing accommodation and work directly with customers to provide flexible payment arrangements specific to their needs. (emphasis added)

¹ Enbridge Gas could not provide detailed information around participation in 2020 or 2024; however it is possible that the remaining 4 customers that did not participate in the 2021 to 2023 period accessed DSM programming in 2020 or 2024.

² To be clear, OGVG will likely explore the reasonableness of sustaining the 2023 level of DSM spending and activity in the contract rate classes within the proceeding to determine the next DSM framework for Enbridge Gas, given the relatively recent nearly perfect penetration in the M7 and, OGVG expects, most other contract rate classes.

Accordingly, OGVG's only request in the context of this application is that Enbridge Gas confirm that it will proactively identify M7 customers that may need billing accommodation and work directly with them as needed.

Yours very truly,



Michael R. Buonaguro