



By EMAIL and RESS

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Our File: 20250189

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

**Attn: Ritchie Murray, Acting Registrar**

Dear Mr. Murray:

**Re: EB-2025-0189 – Enbridge 2023 DSM DVA Clearances**

We are counsel to the School Energy Coalition (“SEC”). Pursuant to Procedural Order #2 in this matter, these are SEC’s submissions.

In general, SEC supports the clearance of these accounts as proposed by the Applicant. However, we have comments on three specific aspects of the Application.

First, the Applicant proposes to substitute its own figure for the shareholder incentive related to smart thermostats, on the basis that the existing “ping” test is not an accurate reflection of installation rates. The EAC reached a consensus supporting that change, but the Evaluation Contractor did not amend its verification results to the new number.

The difference is small, and SEC does not object to including the revised (i.e. Enbridge) figure. However, we note that this involves having a new assumption for installation rate, developed in 2024 through a new study, applied retroactively to 2023 results. The Applicant has always opposed this approach for other assumptions. SEC, on the other hand, has consistently supported using best available information at the time of verification for all assumptions and results, even if the effect is retroactive.

We therefore believe the result is the correct one (i.e. best available information), but note that it would by implication re-establish the value of a pure “best available information” approach to calculating utility DSM performance.

Second, we have had an opportunity to review the submissions of OEB Staff, and their proposal that the Applicant recover \$45 million in DSMVA accruals related to the Home Efficiency Rebate Plus program on an interim basis.



SEC does not support this recovery. In our view, since about 65% of the cost of this program has already been recovered from customers, the remaining 35% should be recovered only after the expected prudence review has been carried out. This can be done in the next DSM DVA Clearance application, later in 2026.

SEC believes that, as Enbridge spent almost \$200 million on this program, and almost \$130 million has already been paid by customers, there is urgency to having a full review, and continuing in the meantime to collect more from customers without proper evidence of prudence is inappropriate. The interest differential is less important than getting the correct recovery amount right, and the sooner the better.

Third, we note that as in the past the Applicant seeks recovery of these DVA balances as a one-time payment. SEC does not object to continuing with this approach for the current balances. Going forward, though, and particularly in light of the many rate changes that may arise as a result of EB-2025-0064, SEC believes it is now a good time to review the timing and method of recovery of DSM DVA balances.

SEC therefore proposes that the OEB direct the Applicant, in their next DSM DVA Clearance application, to come forward with an analysis of options for recovery of these balances going forward, including both one-time and periodic recovery approaches.

All of which is respectfully submitted.

Yours very truly,  
**Shepherd Rubenstein Professional Corporation**

A handwritten signature in black ink, appearing to read "Jay Shepherd", written over a faint, light-colored signature line.

Jay Shepherd

cc: Brian McKay, SEC (by email)  
Interested Parties (by email)