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**From:** Ontario Energy Board <webmaster@oeb.ca>  
**Sent:** Tuesday, February 17, 2026 1:13 PM  
**To:** Office of the Registrar <Registrar@oeb.ca>  
**Cc:** kate@elsonadvocacy.ca  
**Subject:** Intervention Form: EB-2025-0295 - Small Business Utility Alliance

# Intervention Form

## Case Number:

EB-2025-0295

## Requesting information on behalf:

Of an organization

## Intervenor Name:

Small Business Utility Alliance

## Mandate and Objectives:

Small Business Utility Alliance (SBUA) represents and promotes the interests of small businesses as utility customers before administrative and regulatory bodies. SBUA's core objectives are to: 1. Ensure fair and reasonable energy costs for small business ratepayers; 2. Promote programs that help small businesses lower their energy bills, including energy efficiency programs; 3. Promote programs that help small businesses reduce their carbon footprint, including energy efficiency programs; 4. Expand and improve the options for small businesses to participate in clean energy, distributed energy, beneficial electrification, energy efficiency, demand response, and other similar opportunities; and 5. Ensure that utility programs and proposals appropriately account for the unique interests and characteristics of small businesses.

## Membership of the Intervenor and Constituency Represented:

SBUA is made up of over 50 small business ratepayers from regions across Ontario, including Toronto, Ottawa, Chatham-Kent, Wellington, Muskoka, Brant, Suffolk, Norfolk, and Niagara.

In accordance with SBUA's Constitution, the Alliance directs its advocacy to matters that benefit the community of small business ratepayers as a whole and does not represent the individual interests of any specific member.

## **Programs or Activities Carried Out by the Intervenor:**

SBUA acts as a voice for the unique interests of small businesses in regulatory proceedings (including Enbridge DSM proceedings EB-2021-0002 and EB-2024-0198). The Alliance has also engaged in research and volunteer projects with University of Toronto students.

## **Governance Structure:**

The organization is directed by a Steering Committee with decision-making authority and guided by advisory members with specialized expertise.

## **Representatives:**

Kate Siemiatycki  
[kate@elsonadvocacy.ca](mailto:kate@elsonadvocacy.ca)  
4169363965

James Birkelund  
[james@birkelundlaw.com](mailto:james@birkelundlaw.com)  
415-602-6223

## **Cost Claim Filing contact:**

Kate Siemiatycki  
[kate@elsonadvocacy.ca](mailto:kate@elsonadvocacy.ca)  
4169363965

## **Other Contacts:**

James Birkelund  
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415-602-6223

## **Frequent Intervenor Form:**

## **Add all individuals listed on our Frequent Intervenor Form as contacts for this proceeding:**

N/A

## **Names and email addresses of individuals to be added as contacts for this proceeding:**

N/A

## **OEB Proceedings:**

<b>Item Description</b>	<b>Category</b>	<b>Status</b>
2024-0198	Natural Gas – Rates	Granted

## **Issues:**

Small business ratepayers are a critical and underrepresented constituency in the design and review of demand side management planning. As a significant portion of commercial ratepayers, small businesses help fund utility programs and should therefore have a voice in how they are designed and implemented. Moreover, they have unique needs and concerns that diverge from residential and other commercial class members (high proportion of lease holders, significant competing fiscal priorities, frequent lack of in-house energy expertise, frequent small building form, frequently in residential-style premises, etc.). SBUA can efficiently and effectively bring these perspectives to the DSM proceeding in the areas of program design and investment allocation. In particular, SBUA's participation will be focused on ensuring that the approved DSM programs provide cost-effective, accessible and equitable programs that help small businesses improve energy efficiency and reduce natural gas consumption. This would include an examination of the hearing issues from a small business perspective, including the following: -The applicant's proposed commercial program and whether the proposed design and spending optimizes natural gas savings in the most cost-effective way for small business ratepayers; -The applicant's proposed microbusiness program and whether it meets the needs of small businesses operating in formerly residential buildings; -The applicant's proposed modifications to the DSM framework; -The availability of residential offerings for small businesses; -The applicant's proposed natural gas savings goals and whether they meet the direction provided by the OEB in Decision EB-2021-002; -The impact of the proposed shareholder incentives on cost-effectiveness for ratepayers; -Scope of the proceeding as it relates to the cost of carbon and appropriate approach; -The findings of the 2024 Achievable Potential Study and recommended impacts on the DSM plan and framework; and -The applicant's proposed approach to calculating avoided costs and whether it meets the direction provided by the OEB in Decision EB-2021-0002.

## **Policy Interests:**

Not applicable

## **Hearings:**

SBUA understands that this proceeding will be guided by the OEB's 'Major Rates Application Procedures' and as such an oral hearing will take place. The Alliance supports this procedure given the high level of complexity and significant number of affected parties likely to participate in the proceeding.

## **Evidence:**

SBUA expects to seek to submit evidence by expert witnesses from the Green Energy Economics Group, who were previously qualified as experts by the OEB in the DSM proceeding (EB-2021-0002). SBUA requests an opportunity to provide a detailed evidence proposal at a later date, including a detailed deion of the proposed evidence and a cost estimate.

## **Coordination with Other Intervenors:**

The Alliance will coordinate with other intervenors and participants as much as possible to the extent that they share SBUA's objectives. This could include other ratepayer groups, as well as policy organizations.

## **Cost Awards:**

SBUA intends to apply for recovery of its reasonable costs for participating in this proceeding. SBUA is eligible for such a cost award as it "primarily represents the direct interest of consumers" in accordance with s. 3.03(a) of the OEB's Practice Direction on Cost Awards.

## **Language Preference:**

Not applicable