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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-2025-0295
2027–2030 DSM Plan Application**

These are the submissions of the Ontario Greenhouse Vegetable Growers (“OGVG”) with respect to a) the proposed issues list and b) the treatment of carbon pricing within the demand side management (“DSM”) framework proposed by Enbridge Gas Inc. (“Enbridge Gas”).

ISSUES LIST

With respect to the proposed issues list, OGVG has no proposed additions or amendments. Without limiting the breadth of its interest in the proceeding, OGVG’s primary concerns are the proposed level and nature of spending on industrial-agricultural DSM programming and the overall proposed costs recovered from contract level customers, particularly in the context of the newly proposed rate structure proposed in EB-2025-0064 (assuming that new structure is approved). OGVG believes that the current proposed issues list provides for exploration of these issues, subject to, presumably, evidence updates to reflect how the proposed new rate structure, if approved, changes the allocation of DSM costs to customer classes.

CARBON PRICING

OGVG agrees with Enbridge Gas that the Ontario Energy Board (“OEB”) should not attempt to establish its own price of carbon for the purposes of the DSM framework. The OEB’s statutory role is to regulate in accordance with the policies of the Government of Ontario, and in the absence of a carbon price currently imposed by either the provincial

or federal government that is applicable to natural gas consumption in Ontario, there is no basis for the OEB to assign its own carbon value within the DSM framework.

However, OGVG does not believe that the DSM framework should remove the concept of a carbon cost from the Total Resource Cost Plus (“TRC-Plus”) test entirely.¹

The TRC-Plus methodology has historically recognized carbon as a potential component of avoided costs within the DSM cost-effectiveness framework. Preserving that recognition does not require the OEB to determine a carbon price today. Rather, the OEB should ensure that the DSM framework remains capable of reflecting government policy should a carbon price applicable to natural gas consumption be introduced during the term of the DSM plan.

If a carbon price applicable to natural gas consumption is introduced by the provincial or federal during the DSM term, the corresponding cost could then be incorporated prospectively into the avoided-cost assumptions used for the TRC-Plus test. This approach ensures that the DSM framework remains aligned with government policy as it evolves.

Accordingly, OGVG submits that the OEB should direct Enbridge Gas to maintain the recognition of carbon pricing within the TRC-Plus framework and propose a mechanism allowing any future provincial or federal carbon pricing applicable to natural gas consumption to be incorporated into DSM cost-effectiveness calculations during the DSM plan term.

Yours very truly,



Michael R. Buonaguro

¹ To be clear, it does not appear to OGVG that Enbridge Gas seeks to eliminate the consideration of carbon pricing from the TRC-Plus test, arguing instead that, currently, that price should remain set at zero.