



Haris Ginis
Technical Manager
Regulatory Applications
Regulatory Affairs

tel 416 495 5827
cell 416 319 8684
haris.ginis@enbridge.com
EGRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.
500 Consumers Road
North York, Ontario
M2J 1P8

VIA EMAIL and RESS

March 9, 2026

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (“Enbridge Gas” or the “Company”)
Ontario Energy Board (“OEB”) File No. EB-2025-0295
2027-2030 Demand Side Management (“DSM”) Plan Application
Comments on Draft Issues List**

Pursuant to the OEB’s Procedural Order No. 1 dated February 27, 2026 in the above-noted proceeding, enclosed please find Enbridge Gas’s comments on the draft Issues List.

If you have any questions, please contact the undersigned.

Sincerely,

Haris Ginis

Haris Ginis
Technical Manager, Regulatory Applications

cc: Dennis O’Leary (Aird & Berlis LLP, Enbridge Gas Counsel)
Raman Dhillon (OEB Counsel)
Michael Bell (OEB Staff)
Intervenors (EB-2025-0295)

Background

1. On February 27, 2026, the OEB issued Procedural Order No. 1 which, among other things, included a draft Issues List (appended as Schedule B to the Procedural Order) and invited parties to file comments by March 9, 2026, indicating any proposed modifications to the draft Issues List. Enbridge Gas's comments are provided below.

Draft Issue No. 2

2. Draft Issue No. 2 reads: "Does Enbridge Gas's 2027-2030 DSM Plan adequately support energy conservation, energy efficiency, and integrated planning in accordance with the policies of the Government of Ontario, including having regard to the economic circumstances of consumers and Indigenous communities?"
3. In June 2025, the Government of Ontario released its first Integrated Energy Plan ("IEP")¹ and Natural Gas Policy Statement,² marking a significant development in provincial energy policy. The IEP highlights, at Chapter 1, the natural gas energy efficiency programs delivered by Enbridge Gas under the oversight of the OEB.³ Importantly, the IEP provides the Government of Ontario's vision of the future role of natural gas and emphasizes its critical importance for Ontario's energy sector and broader economy. Accordingly, Enbridge Gas submits that draft Issue No. 2 should explicitly reference the IEP to ensure the Application sufficiently aligns with the IEP. Enbridge Gas proposes the following language be added to the Issue (additional language underlined):

"Does Enbridge Gas's 2027-2030 DSM Plan adequately support energy conservation, energy efficiency, and integrated planning in accordance with the policies of the Government of Ontario and its

¹ Government of Ontario, *Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7* ("Integrated Energy Plan" or the "IEP"), June 2025 ([link](#)).

² IEP, Chapter 5 ([link](#)).

³ IEP, p. 36 ([link](#)).

Integrated Energy Plan, including having regard to the economic circumstances of consumers and Indigenous communities?”

Draft Issue No. 13

4. Draft Issue No. 13 reads: “Has Enbridge Gas proposed an optimal suite of program offerings that will maximize natural gas savings and provide the best value for rate payer funding?”
5. The wording of the draft Issue implies that the primary/sole objective of DSM is to maximize natural gas savings. This is incorrect and should be amended. Maximizing natural gas savings in isolation is not the primary nor sole objective of DSM; rather, DSM is intended to balance several competing objectives including achieving cost-effective natural gas savings, balancing customer bill impacts, and ensuring equitable access and participation across customer segments.⁴ Furthermore, the Government of Ontario’s IEP emphasizes an “affordability first” approach and identifies affordability as one of four principles central to the government’s energy plan.⁵ Accordingly, Enbridge Gas submits that draft Issue No. 13 should be modified as follows (modifications underlined) to ensure all considerations, including but not limited to balancing customer bill impacts, are considered in relation to the Application:

“Has Enbridge Gas proposed an optimal suite of program offerings that is responsive to the DSM Framework’s objectives and guiding principles?”

Draft Issue No. 18

6. Draft Issue No. 18 reads: “How has Enbridge Gas considered deploying its proposed DSM programs to meet the Integrated Resource Planning objectives?”

⁴ EB-2021-0002, OEB DSM Framework (Schedule E of OEB Decision and Order), November 15, 2022, pp. 1-4 ([link](#)).

⁵ IEP, pp. 6 and 12 ([link](#)).

7. The wording of the draft Issue implies that DSM programs should be designed/delivered to meet Integrated Resource Planning (“IRP”) objectives. This is incorrect and should be amended. DSM programs are not (and should not be) designed to meet IRP objectives, as DSM and IRP activities are fundamentally different from one another, have different objectives, and operate under separate OEB frameworks (i.e., the DSM Framework⁶ and the IRP Framework⁷).
8. DSM relates to activities that reduce total natural gas throughput across Enbridge Gas’s system whereas IRP relates to the assessment and implementation of natural gas facility alternatives to address a specific system need. Under IRP, an IRP alternative (“IRPA”) could involve energy efficiency programming (referred to as Enhanced Targeted Energy Efficiency or “ETEE”); however, ETEE programs are designed with the objective of reducing natural gas peak demand (not total natural gas throughput, as is the case with DSM) within a geotargeted area to address a specific system constraint (not across Enbridge Gas’s system, as is the case with DSM). As a result, DSM programs are not designed to meet IRP objectives and, similarly, ETEE IRPA programs are not designed to meet DSM objectives.
9. Enbridge Gas acknowledges that there may be some IRP-related matters relevant to this Application; however, this would be limited to whether the Company’s DSM Plan is consistent with existing IRP direction/guidance, where applicable. Accordingly, Enbridge Gas submits that draft Issue No. 18 should be replaced with the following:

“Does Enbridge Gas’s proposed 2027-2030 DSM Plan require any changes to be consistent with OEB direction and guidance regarding Integrated Resource Planning?”

⁶ EB-2021-0002, OEB DSM Framework (Schedule E of OEB Decision and Order), November 15, 2022 ([link](#)).

⁷ EB-2020-0091, OEB IRP Framework (Appendix A of OEB Decision and Order), July 22, 2021 ([link](#)).