

March 9, 2026

Ian A. Mondrow
Direct 416-369-4670
ian.mondrow@gowlingwlg.com

VIA RESS

Mr. Ritchie Murray, Acting Registrar
ONTARIO ENERGY BOARD
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Mr. Murray:

Re: EB-2025-0295: Enbridge Gas Inc. (EGI) Application for Multi-Year Natural Gas Demand Side Management Plan (2027-2030).

Industrial Gas Users Association (IGUA) Issues List Comment.

We are counsel to IGUA and write with preliminary comment on the Draft Issues List included in Procedural Order No. 1.

Role of DSM in Integrated Resource Planning (IRP)?

Issues 2 and 18 on the Draft Issues List contemplate a role for DSM in Integrated Resource Planning (IRP). DSM and IRP are activities with separate and distinct objectives and regulatory frameworks. While there may well be overlap in these activities and their respective regulatory frameworks, they remain distinct.

In respect of the instant application, it is not evident that the DSM Program necessarily has a direct role to play in respect of the IRP Framework. Accordingly;

- a. Issue 2 should be reworded so as to avoid a presumption that EGI's DSM Plan should support integrated planning (though it would be reasonable for the OEB to invite discussion of whether EGI's DSM Plan has a role to play in respect of integrated planning).
- b. Issue 18 should be amended to reflect that whether or not, and if so how, EGI's DSM Program should consider and address IRP and the IRP Framework, are open issues.

EGI's Consideration of Input into its DSM Program

Issue 4 on the Draft issues List seems to assume that input from all of the Stakeholder Advisory Group (SAG), the OEB's Achievable Potential Study, parties during stakeholder sessions and the Indigenous Working Group is to be not only considered but also necessarily reflected in EGI's DSM

Plan. While we agree that input from each of these sources should be considered, whether such input should all necessarily be reflected in the DSM Plan is not obvious (though is legitimately considered).

To reflect this distinction, the OEB could reword draft issue 4 as follows:

Does ~~Did~~ Enbridge Gas's 2026-27-2030 PDSM Plan adequately consider and, as appropriate reflect, input from the Stakeholder Advisory Group report, the OEB's Achievable Potential Study, and from parties during the stakeholder sessions and the Indigenous Working Group?

Further Comments

We anticipate attendance at the scheduled Issues Conference at which point we may seek to offer comments on issue proposals by other parties.

Yours truly,



Ian A. Mondrow

- c. Nazim Sebaa, IGUA
Haris Ginis, EGI
Dennis O'Leary, EGI Counsel
Intervenors of Record

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