

Mr. Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

March 9, 2026

**EB-2025-0295 Enbridge 2027-2030 Demand Side Management Plan  
Pollution Probe Comments on Issues List**

Dear Mr. Murray

In accordance with Procedural Order No. 1 for the above-noted proceeding and the related Ontario Energy Board (OEB) communication dated March 5, 2026, please find attached Pollution Probe's letter proposing a change to the Draft Issues List to ensure proper focus, efficiency and clarification to specific relevant issues.

Pollution Probe also intends to actively participate in the Issues Conference on March 12 and may attend in person or virtually, depending on the resolution of scheduling issues currently being worked through. In addition to a schedule for the Issues Conference, it would be helpful to understand the format well in advance of the conference. Issues Conference typically occur between parties without the OEB Panel and is followed by written submissions if agreement is not reached. It appears that the March 12 Issues Conference is intended for parties to make oral submission to the OEB Panel and then the OEB would issue a final Issues List following the conference. If that is correct, appropriate time is required to prepare and file any supporting reference materials. It would also be helpful to begin the conference with a presentation by Enbridge to respond to the proposed Draft Issues Lists changes and Enbridge's submissions on any changes proposed. This would lead to a more efficient process.

Pollution Probe does not agree with the assertion that the economic cost of carbon should be explicitly struck from this proceeding and that the OEB lacks authority to consider an appropriate cost of carbon as part of a DSM Plan review. If Enbridge believed that the recent OEB Decision<sup>1</sup> (and/or others that related to the same issue) exceeded the authority of the OEB, the appropriate approach would have been to follow the prescribed process to challenge those decisions. Enbridge has followed that process previously<sup>2</sup>. Attempting to retroactively modify an OEB decision(s) through this proceeding is not appropriate.

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<sup>1</sup> EB-2024-0198 Decision

<sup>2</sup> Including recently for EB-2024-0111 and EB-2025-0333.

Pollution Probe also does not agree that inclusion of the economic cost of carbon is in conflict with Government of Ontario policy; and that it would be inconsistent with the objectives of the OEB's DSM Framework. In fact, a review of the relevant details suggests the opposite.

Pollution Probe is aware that Issue 3 already includes compliance to previous OEB decisions and orders, including the most recent DSM Decision<sup>3</sup> which specifically directs Enbridge to include the economic cost of carbon in Enbridge's application under this proceeding. Pollution Probe is aware that some parties may believe that is sufficient or some may argue that this topic should no longer be considered relevant to the OEB. However, based on the OEB's March 5, 2025 letter and the underlying position of Enbridge, it would be more clear and efficient to explicitly include this under Issue 16.

Pollution Probe recommends that Issues 16 be revised from:

*Issue 16: Are Enbridge Gas's proposed updates to the treatment of input assumptions, cost-effectiveness, and avoided costs appropriate?*

To become:

*Issue 16:*

*a) Is Enbridge Gas's treatment of input assumptions, cost-effectiveness, avoided costs, economic cost of carbon and non-energy benefits (NEBs) appropriate?*

*b) Have the inputs and assumptions noted above been appropriately applied to the DSM Plan.*

The above proposed updates to Issue 16 include the input provided through coordination with other stakeholders. Pollution Probe is also aware that some of these parties may include some additional issue wording improvements based on the discussions.

Pollution Probe is aware that the School Energy Coalition (SEC) is planning to include a proposed issue related to the DSM Stakeholder Advisory Group (SAG). Pollution Probe supports including this issue since the current SAG does not meet the purpose that was intended and it has not been an effective mechanism to solicit stakeholder feedback or grow DSM in alignment with policy objectives and the public interest. Resolving these issues is essential to successful DSM and unlocking the low hanging fruit that still exists in Ontario.

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<sup>3</sup> EB-2024-0198.

Respectfully submitted on behalf of Pollution Probe.

  

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