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VIA EMAIL and RESS

April 24, 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-2025-0156
Regulatory Treatment of Local Electricity Demand-Side Management (Stream
2) Programs
Comments on Draft Revisions to the Non-Wires Solutions Guidelines**

Pursuant to the OEB’s letter dated March 31, 2026, in the above-noted proceeding, enclosed please find Enbridge Gas’s comments on the draft revisions to the Non-Wires Solutions Guidelines for Electricity Distributors.

If you have any questions, please contact the undersigned.

Sincerely,

Haris Ginis

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Technical Manager, Regulatory Applications

cc: Michael Parkes (OEB Staff)

A. BACKGROUND

1. On March 31, 2026, the OEB released draft revisions to the Non-Wires Solutions Guidelines for Electricity Distributors (“NWS Guidelines”), including new guidance for Stream 2 local electricity demand-side management (“eDSM”) programs, and invited registered participants to submit written comments on the draft revisions by April 24, 2026. Enbridge Gas’s comments are provided below.

2. ENBRIDGE GAS COMMENTS

General Comments

3. Enbridge Gas understands that the NWS Guidelines are intended to provide guidance on the role of non-wires solutions for rate-regulated electricity distributors and reflect electricity sector policy considerations. On that basis, as a natural gas distributor, Enbridge Gas does not take any substantive positions on the draft revisions to the NWS Guidelines and limits its comments to promoting regulatory clarity/efficiency and avoiding unintended implications for the natural gas sector.
4. Enbridge Gas expects that natural gas sector Integrated Resource Planning (“IRP”) issues will be addressed in the OEB’s natural gas IRP Framework Review proceeding.¹ This proceeding provides the appropriate forum to consider IRP issues as they relate to the natural gas sector specifically. Accordingly, any determinations in this electricity sector proceeding should not be presumed to apply to the natural gas sector.

¹ EB-2025-0125.

Appendix to NWS Guidelines – Potential Duplication of Natural Gas DSM Programs

5. Enbridge Gas submits that, where the Appendix to the NWS Guidelines addresses the potential duplication of Stream 2 Programs with province-wide or regional eDSM programs delivered by the IESO,² the NWS Guidelines should similarly ensure that Stream 2 Programs avoid duplication with existing natural gas DSM programs. This would ensure that customers are not presented with overlapping or duplicative electricity and natural gas programming, and would avoid customer confusion.

² For example, see pages 8, 11, 24, and 29 of the Draft Appendix to NWS Guidelines, March 31, 2026.