

Elson Advocacy

May 12, 2026

Ritchie Murray

Registrar

Ontario Energy Board

2300 Yonge Street, 27th Floor

Toronto, Ontario M4P 1E4

Dear Mr. Murray,

**Re: Enbridge 2027-2030 Demand Side Management (“DSM”) Plan
EB-2025-0295**

I am writing on behalf of the Green Energy Coalition (“GEC”) and Environmental Defence Canada pursuant to *Procedural Order #3* to seek approval from the OEB for the proposed evidence by the Energy Futures Group regarding the Enbridge Gas 2027-2030 DSM plan. The evidence would assess Enbridge’s DSM plan and provide concrete recommendations, with a focus on cost-effectiveness, gas savings levels, and program design, as outlined below.

Expertise of Chris Neme and the Energy Futures Group

The development of the evidence would be led by Chris Neme of the Energy Futures Group. Mr. Neme is a leading expert in DSM generally and the Ontario DSM context. Over the past three decades, Mr. Neme has worked for energy regulators, utilities, government agencies and other organizations in more than 30 states, 7 Canadian provinces and several European countries. He has defended expert witness testimony in approximately 75 cases before regulatory commissions in 14 different jurisdictions. He has also testified before several state legislatures.

Mr. Neme served on the Enbridge and Union natural gas demand side management audit/evaluation committees since their inception more than two decades ago and currently sits on the gas DSM Evaluation Committee and gas Integrated Resource Planning (IRP) technical working group. He has also previously served as an external reviewer of efficiency potential studies. He has earned broad respect and trust from the Ontario regulatory community and has been elected to these committee roles by other intervenors and/or appointed by the OEB. Mr. Neme has provided expert testimony in more than 25 OEB cases. Mr. Neme’s CV is attached.

Proposed Evidence Details

The evidence would assess Enbridge’s DSM plan and provide concrete recommendations. Mr. Neme’s review of the DSM plan would be comprehensive, but limited to the issues as set out in the OEB-approved issues list and appropriately scoped to avoid undue duplication with the testimony of other experts.

At the highest level, the evidence is expected to focus on cost-effectiveness (including potential recommendations to improve the overall cost-effectiveness of the programs), gas savings levels (including potential recommendations on how to enhance targeted gas savings levels), and program design (including potential recommendations on how to improve program design, such as measure incentive levels, in support of DSM goals). Other potential topic areas to be explored include: (a) whether Enbridge's avoided cost assumptions are appropriate, including the assumptions on avoided transmission and distribution costs, (b) whether the discount rate is appropriate, (c) whether Enbridge's proposed new opt-out process and criteria for large volume customers are appropriate, (d) whether customer access can be improved through instant rebate measures that do not require customers to cash-flow rebate amounts, (e) consistency and coordination with IESO programs, (f) whether greater emphasis should be placed on the Program Administrator Cost Test to ensure symmetrical treatment of costs and benefits and achieve greater consistency with IESO approaches, (g) whether Enbridge's proposed shareholder incentives are appropriate, and (h) other topics captured by the issues list that arise based on a further review of Enbridge's evidence and interrogatory responses.

GEC and Environmental Defence commit to communicating with other parties to avoid undue duplication in the development of evidence. For instance, if the Low Income Energy Network ("LIEN") and the Small Business Utility Alliance ("SBUA") retain experts, we anticipate that they would take the lead on recommendations focused on the low income program and on programming aimed at small businesses.

Budget

We anticipate the cost for Energy Futures Group to prepare its report to be between \$70,000 and \$95,000 at the OEB tariff, including reviewing the DSM plan, drafting interrogatories on the plan, reviewing Enbridge's interrogatory responses, researching the key topic areas, coordinating with other intervenors, and preparing the report and its recommendations. The steps following the preparation of the report are considerably more difficult to estimate as they involve factors outside of the control of the Energy Futures Group, such as the number and complexity of the interrogatories received, whether a technical conference is held, the time required for oral testimony, and any other unanticipated procedural steps. With those caveats, the additional steps following the preparation of report may add an additional \$30,000 to the cost. We anticipate incremental counsel cost to be approximately \$6,500.

Conclusion

The proposed Enbridge DSM plan includes a number of important new elements that would benefit from external expert review by Mr. Neme, including the new large industrial opt-out option, Enbridge's involvement in the joint IESO program, and a significant scaling back of certain programming. An external review is also warranted by the relatively low gas savings levels, which fall considerably short of those directed by the OEB, and the need for new approaches to increasing savings levels and cost-effectiveness.

The proposed DSM plan is forecast to provide over \$1 billion in net benefits to Enbridge customers (over \$2.4 billion in gross benefits) and has the potential to generate much greater benefits for customers.¹ In this context, and in light of Mr. Neme's extensive expertise, the proposed evidence is very good value for money and should be approved by the OEB.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', written in a cursive style.

Kent Elson

cc: parties in the above proceeding

¹ Exhibit D, Tab 3, Schedule 1, Page 2-5.