

# Elson Advocacy

May 12, 2026

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

Dear Ritchie Murray:

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

I am writing on behalf of the Small Business Utility Alliance (“SBUA”) pursuant to Procedural Order No. 3 to request the opportunity to file expert evidence in this proceeding. As detailed below, the evidence will assist the OEB in its mandate to ensure that Enbridge’s 2027-2030 DSM proposal optimizes gas savings in the most cost-effective and fair manner.

**Proposed Experts– Green Energy Economics Group**

SBUA proposes to file expert evidence from Francis Wyatt and Theodore Love of the Green Energy Economics Group (“GEEG”). GEEG is well placed to provide evidence in this proceeding as a result of their previous participation in Enbridge’s 2022-2026 DSM application (EB-2021-0002), as well as Mr. Wyatt’s membership in Enbridge’s DSM Stakeholder Advisory Group.

Mr. Wyatt is a civil engineer with over 34 years of experience in the energy efficiency field, during which he has reviewed, critiqued, analyzed and assisted with electric, gas and other fuels demand-side management program planning, design and implementation. He has particular expertise in the commercial and industrial sectors and cost-effectiveness screening and model development. He has developed several technical reference manuals for gas and electric savings. He has played key roles in developing several efficiency and renewable economically achievable potential studies. Mr. Wyatt has collected, analyzed, and compared the DSM spending and savings by sector from many jurisdictions over the last 34 years. Mr. Love is also an expert in energy efficiency who specializes in providing economic-based insights into the design, analysis and implementation of energy efficiency and distributed energy resource programs.

Their experience spans multiple jurisdictions in North America, including Nova Scotia, British Columbia, Ontario, Massachusetts, Maryland, California, Vermont, New Jersey, Pennsylvania, Wisconsin, Louisiana, Texas, the District of Columbia, Illinois, Oklahoma, Connecticut and Florida.

### **Anticipated Evidence: DSM Topics and Issues**

The proposed evidence from GEEG will examine multiple areas of the 2027-30 DSM plan, including with a focus on the following questions as they relate to the small business sector:

- Do the proposed commercial offerings, including small and micro business offerings respond to the unique economic circumstances of small businesses and the barriers that exist for these customers' participation in DSM programs? (*Issues List 9, 13(g)*)
- How does Enbridge's planned treatment of small businesses compare to other jurisdictions and industry best practices for serving small businesses? (*Issues List 5*)
- Are small business energy savings appropriately addressed in the proposed scorecard design? (*Issues List 12(c)*)
- Are the proposed new-build commercial incentives appropriate and optimal? (*Issues List 13(c)*)
- How does the design of shareholder incentives, performance metrics and targets affect the treatment of small businesses? (*Issues List 15*)
- Are the cost-effectiveness inputs and assumptions for commercial programs appropriate and optimal? (*Issues List 16*)
- How does the proposed plan align with energy conservation and other electrification measures? (*Issues List 7, 18*)
- What should be included in a stakeholder engagement plan as it relates to small businesses? (*Issues List 19*)

This evidence is particularly important in this proceeding as it is the first time Enbridge has introduced a specific small and micro business offering. It is crucial that the Board is able to assess whether the new program optimizes gas savings opportunities for this customer base before it is introduced to the market. GEEG's expertise will be invaluable to supporting the Board's analysis in this regard.

### **Anticipated Budget**

GEEG will undertake extensive review of the evidence in this proceeding, participate in the interrogatory process and prepare an expert report on the topics listed above. As part of this work, GEEG will coordinate with other intervenors to reduce any potential redundancy.

The anticipated costs for their participation are between \$40,000 and \$70,000 with incremental counsel costs of approximately \$6,500.

**Conclusion**

The proposed expert evidence will benefit the Board in assessing many aspects of the DSM plan, including the new small and micro business incentives. The relatively low cost of the proposed evidence is well worth the benefit to ensuring that the proposed plan is achieving its mandated goals for all customer segments.

Yours truly,



Kate Rose Siemiatycki