

EB-2025-0295 - Coordinating Intervenors:  
DR Quinn & Associates Ltd, on behalf of Federation of Rental-housing Providers of Ontario  
Myfanwy Parry, on behalf of Housing Services Corporation

May 21, 2026

Ritchie Murray  
Acting Registrar  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

**Sent Via Email & RESS**

Dear Mr. Murray:

**Re: EB-2025-0295 Enbridge Gas 2027-2030 DSM Plan Application – Interrogatories**

Enclosed please find the coordinated interrogatories of Federation of Rental-housing Providers of Ontario (FRPO) and Housing Services Corporation (HSC) in the above matter.

If there are any questions with respect to the interrogatories, please feel free to contact the undersigned.

Respectfully,



Dwayne R. Quinn, Principal  
DR Quinn & Associates Ltd. on behalf of  
Federation of Rental-housing  
Providers of Ontario



Myfanwy Parry  
Senior Manager, Energy Services  
Housing Services Corporation



cc: Parties to the above proceeding

**EB-2025-0295 – EGI 2027-2030 DSM Plan Appl.**

**Interrogatories of Federation of Rental-housing Providers of Ontario (FRPO) and Housing Services Corporation (HSC)**

May 21, 2026

**C-FRPO-1,2**

**REF:** Ex. C, Tab 1, Sch. 4, Attachment 1, pg. 52 & Sch. 6, pg. 3

*Preamble:*

*Incorporate building operator training as part of the income qualified multi-residential offer (but should not be income qualified specific as opportunities exist in the building market generally).*

*Questions:*

- 1) How is this building operator training different from the previous offer of “Run it Right”?
- 2) Does building market generally refer to multi-residential buildings and, if so, what is the implication?

**C-FRPO-3**

**REF:** Ex. C, Tab 1, Sch. 4, Attachment 1, pg. 52 & Sch. 6, pg. 3

*Preamble:*

In the second reference, the evidence quotes the November 29, 2023 Minister of Energy’s Letter of Direction stating: *Building on this success, we must now turn our attention to delivering this same level of service to non-income tested residential customers.*

*Questions:*

- 3) Does EGI see this direction as including multi-unit residential customers that are not income qualified?
  - a. If so, how do the EGI proposed programs address this?
  - b. If not, why not?

## **C-FRPO/HSC-4**

**REF:** Ex. C, Tab 1, Sch. 4, Attachment 1, pg. 52 & Ex. C, Tab 1, Sch. 6, pg. 3

*Preamble:*

The first reference includes: “*Enbridge should continue working with the IESO to ensure consistency and alignment between gas and electric programs for eligible income qualified customers*”

The second reference includes: “*Enbridge Gas and the IESO subsequently worked closely together to design and implement a one-window approach to residential DSM programming; branded as the Home Renovation Savings (“HRS”) Program.*”

We would like to understand more about EGI’s work with the IESO as applied to MURB’s beyond the Certified Sustainable Building Operator (“CSBO”).

*Questions:*

- 4) What barriers can EGI identify that prevents the One-Window approach with MURB’s?
  - a. Why is EGI not pursuing during this term?
  - b. How soon could the program be expanded to MURB’s?

## **C-FRPO/HSC-5,6**

**REF:** Ex. C, Tab 1, Sch. 4, Attachment 1, pg. 49, Figure 5 & Table 8

*Preamble:*

The referenced figure depicts a decreasing trend in Affordable Housing Multi-Residential (Spend) and (Net m<sup>3</sup>). We would like to understand what factors contributed to these trends and how EGI’s proposals address these factors.

*Questions:*

- 5) What factors contributed to the reduced spend in Affordable Housing?
  - a. How will the Income Qualified Multi-Residential Proposal in Table 8 and elsewhere in evidence address these factors?
- 6) What factors contributed to the reduction of Net m<sup>3</sup> on total and per \$ spend basis?
  - b. How will the Income Qualified Multi-Residential Proposal in Table 8 and elsewhere in evidence address these factors?

## **C-FRPO/HSC-7,8,9,10**

**REF:** Ex. C, Tab 1, Sch. 5, Attachment 8

*Preamble:*

The above reference refers to EGI 2026-30 DSM Plan Portfolio Summary presented October 3, 2024. Notwithstanding EGI's proposal to limit historic reporting in annual reporting (Exhibit C, Tab 1, Schedule 1 pg. 7-9), we believe that to understand EGI's proposed Framework going forward, it is our view, that the Board and stakeholders would benefit from seeing the context of the proposed Framework's program budgets and results in the previous Frameworks. We understand that with the evolution of programs there may not be a precise fit for the purposes of allocations so that we ask that EGI provide the best fit and highlight any outliers.

*Question:*

- 7) For each of the program areas costs forecasted in Ex. C, Tab 1, Schedule 5, Attachment 8, please provide the actual annual spending for the 2015-2024 period, categorized by Customer Incentives, Promotion, Delivery, Administration, and Total.
- 8) Has EGI needed recourse for using the DSM Variance Account within the 2015-2024 period on either HWP or AHMR?
  - a. If so, explain the reasons and state dollar amounts and affected measures.
- 9) What is the likelihood of running out of Incentive budget for the proposed 2027-2030 HWP and AHMR programs before the end of 2030?
- 10) Please indicate if EGI had to stop offering either of the AHMR or HWP programs and/or certain measures within those programs over the 2015-2026 period due to budget constraints?
  - a. If so, please list the affected measures, amounts, and reasons.

## **C-FRPO/HSC-11**

**REF:** Ex. C, Tab 1, Sch. 6, pg. 10

*Preamble:*

EGI evidence states: *The Government of Canada and the Province of Ontario continue to offer a range of energy efficiency initiatives that support emissions reductions, improve energy performance, lower customer energy costs, and align with long-term energy planning.*

Question:

- 11) Please provide a list of programs for which federal or provincial government funds are available to MURB's that are facilitated by EGI's DSM program.

## **D-FRPO-12**

**REF:** Ex. D, Tab 2, Sch. 1, Table 1

Question:

- 12) For each of the program areas Scorecards proposed in Ex. D, Tab 2, Schedule 1, Table 1, please provide the results obtained for the 2015-2024 period, categorized by Metric, Weight and Targets (incl. Range), DSMI Allocation, Score and Resulting Incentive.

## **D-FRPO-13**

**REF:** Ex. D, Tab 4, Sch 1, pg. 2

*Preamble:*

*Enbridge Gas may reallocate DSM staff resources between programs and/or the portfolio level as permitted by the DSM Framework to optimize DSM activities. Additionally, Enbridge Gas will be required to manage DSM staff resources within the budgets that are approved by the OEB, if they are adjusted from the proposed levels. As a result, the actual allocation of FTEs to the various DSM programs may change.*

While we understand EGI's proposal for the attribution of savings (Exhibit C, Tab 1, Schedule 7, pg.2), we would like to understand better how staff costs will be allocated when EGI undertakes Enhanced Targeted Energy Efficiency (ETEE) as part of an Integrated Resource Planning Alternative (IRPA).

Questions:

- 13) In a project where EGI is implementing ETEE to reduce or eliminate the need for traditional infrastructure:
  - a. Will EGI deploy DSM-trained staff whose salaries have been budgeted in DSM?
    - i. If so, how will the staff costs be allocated?
    - ii. If not, how will IRPA staffing be constituted?

## D-HSC-14,15

REF: Ex. D, Tab 2, Sch. 2, pgs. 9-12

### *Preamble:*

In the table below, HSC summarizes EGI's proposed budgets for promotion, incentive, and delivery costs from Tables 2-5 of Ex. D, Tab 2, Sch. 2 (pgs. 9-12) as cost percentage ranges for the AHMR, HWP, Residential, and Commercial programs. Administration Costs were excluded from the calculation since they are not broken out for the two IQ offerings.

*HSC Table: Summary of Proposed Budget by Cost Percentage Range*

Program	As a Percentage of Program Budget (excluding Administration Costs)		
	Promotion Costs	Incentive Costs	Delivery Costs
<b>IQ: AHMR</b>	<b>11.1 – 11.7%</b>	<b>85.3 – 86%</b>	<b>2.9 – 3%</b>
Commercial	4.5 – 5.7%	86.8 – 88.1%	7.4 – 7.6%
<b>IQ: HWP</b>	<b>9.2 – 10.4%</b>	<b>77.3 – 80.3%</b>	<b>10.4 – 12.3%</b>
Residential	7.9 – 8.7%	82.6 – 83.8%	3.4 – 3.7%

The above comparison shows that Promotion Costs represent a higher percentage and Incentive Costs a lower percentage of AHMR and HWP budgets compared to budgets for Commercial and Residential. Delivery Costs are lower for AHMR than Commercial, and higher for HWP than for Residential for various understood reasons.

HSC understands that eligible Income Qualified segments are considered harder to reach. We have communicated to EGI in prior conversations that, within the community (social) housing sector, there are established channels for outreach in the form of municipal Service Managers and sector organizations that can be leveraged to efficiently reach community housing providers.

We seek to understand EGI's proposed Promotions and Incentives Costs for AHMR and HWP in a broader residential/commercial building context.

### *Questions:*

- 14) Has EGI considered increasing HWP and AHMR Incentive budgets without reducing Promotions to achieve similar Incentives vs. Promotions Costs percentage ranges to those of Residential and Commercial programs?
  - a. If so, in what ways and what was increased?
  - b. If not, why not?

15) Please indicate whether EGI requires its AHMR and HWP delivery agents to provide EGI with lists of those community housing providers contacted within the delivery agent's contract term.

a. If not, why not?

## **D-FRPO/HSC-16**

**REF:** Ex. E Tab 4 Sch 4 pg. 6 Hybrid Rooftop

*Preamble:*

*The offering now includes additional TRM measures such as Adaptive Thermostats and Hybrid Rooftop Units ("RTU"). This expansion caters to a broader group of eligible customers and aligns with recommendations from previous DSM Plan proceedings to add new measures to the direct install offering to enable meaningful participation from small commercial customers.*

We would like to understand more about "commercial hybrid rooftop units".

*Questions:*

16) Has EGI studied commercial hybrid rooftop units for multi-unit residential buildings?

- a. Please provide data (expected determination of savings, costs of equipment, upgrade costs broken out) for a case study from a project that integrated electric heat pumps that was successful.
  - i. Please ensure that all costs associated with the electric equipment including upgrades is provided.
- b. Please provide a comparable break down for a project that did not proceed due to costs of electric upgrade.

## **E-FRPO-17,18**

**REF:** Ex. E, Tab 3, Schedule 1, page 12

*Preamble:*

EGI evidence states: "*Income Qualified Program encompasses important components such as:*

...

- *Turnkey, fully funded weatherization programming for income qualified residents*

*of single family and low-rise social housing;”*

We would like to understand better the Low-income program and practices related to multi-family residential housing.

*Questions:*

- 17) Is the turnkey, fully funded weatherization programming available to qualified, privately-owned affordable housing? If not, why not?
- 18) For the period of 2015-2024, please provide the low-income, resource acquisition savings for single family and multi-family residential buildings separately. Please provide the results on an annual basis for each legacy utility/rate zone and categorized by social housing or privately-owned buildings.
  - a. As a result of the savings provided, please comment on strategies that EGI believes will have greatest efficacy in terms of m3 savings and ratepayer value.

## **E-FRPO-19,20**

**REF:** Ex. E, Tab 3, Schedule 3, page 3

*Preamble:*

EGI evidence states: *“Privately Owned Multi-Residential Buildings – The following must be demonstrated:*

- i. Privately owned multi-residential building owner or property manager must confirm, based on rent roll review, that at least 30% of the units are rented at less than 80% of the median market rent, as determined by the CMHC. Where median rental data is not available through the CMHC portal, Enbridge Gas will use the rental data outlined within the applicable municipality's current Affordable Housing Plan.*
- ii. The building has participated in a federal, provincial, or municipal affordable housing funding program within the preceding 5 years.*
- iii. Participants with privately owned facilities must also sign a declaration indicating they have been qualified via rent roll or by receiving previous funding for affordability.”*

We would like to understand the effectiveness of the above criteria in identifying and providing low-income DSM to privately-owned multi-family buildings under the previous framework.

*Questions:*

19) For the period of 2021-24, for successful installation of low-income DSM initiatives, please provide the percentage of buildings qualified using each of the above criteria.

20) Specific to the last qualification, please confirm that the agreement is to forego an Above Guideline Increase associated with work undertaken as part of the Low-income DSM program.

## **E-FRPO-21,22**

**REF:** Ex. E, Tab 4, Sch.1, pg 16-17

*Preamble:*

*The Commercial/Industrial Prescriptive Direct Install Offering will focus on hard-to-reach customers (e.g., restaurants, retail) by providing turnkey solutions with higher incentives, while the Commercial/Industrial Prescriptive Upstream Offering will see an increase in incentives and an expansion of participating distributors and manufacturers.*

We would like to understand more about the value proposition of the Prescriptive Direct Install Offering.

*Questions:*

21) For such an Offering, does the contractor achieve a profit margin on cost of the equipment installed?

22) Does Enbridge receive a profit margin on cost of the equipment installed?

## **E-HSC-23,24,25,26**

**REF:** Ex. D, Tab 2, Sch. 2, Tables 2-5; & Ex. E, Tab 3, Sch. 2, point 9

*Preamble:*

In Ex. D, Tab 2, Sch. 2, Tables 2-5, EGI budgets \$31,598,000 in total 2027-2030 incentives for heat pumps under the Residential program. Factoring in promotions and delivery, the total Residential program heat pump offering budget is \$36,982,000.

There is no similar offering in the Income Qualified programs. In Ex. E, Tab 3, Sch. 2, point 9, EGI states: *“While electric heat pumps reduce natural gas and offer efficiency gains, they involve fuel switching and can increase electricity costs, especially if the home previously lacked air conditioning. For this reason, implementing them in the income qualified sector would not be appropriate, as it could raise energy costs for individuals already facing financial constraints.”*

HSC has communicated to EGI that heat pump incentives are a high priority support for community housing providers. Extreme heat is a growing concern for the vulnerable populations they serve. In addition to achieving energy conservation goals, heat pumps enable community housing providers to cost effectively add cooling to older buildings. Excluding heat pumps from Income Qualified programs will adversely impact tenants who could benefit from access to cooling. For many community housing units, the landlord pays the electricity bill. In fuel switching scenarios where the tenant is responsible for utilities, natural gas cost reductions and adjustments to rent-geared-to-income utility allowances mitigate electricity cost increases. Furthermore, providing educational resources to enable tenants to make cost-informed use of in-suite cooling from the heat pump is a far better option than excluding them from access to cost- and energy efficient cooling.

HSC has also communicated examples to cost-effectively integrate heat pump that do not necessarily require complete fuel switching, yet achieve gas savings:

- Replacing heating-only make-up air units with new make-up air units that use heat pumps to provide cooling and partial heating while relying on natural gas heating systems for supplementary heating;
- Replacing chiller and cooling tower systems with heat pumps to provide full cooling and partial heating while relying on natural gas heating systems to provide the remainder of the heating demand;
- Installing heat pumps to provide full cooling and partial heating while relying on natural gas heating systems to provide the remainder of the heating demand; and
- Installing heat pumps to provide a portion of the domestic hot water demand while relying on natural gas heating systems to provide the remainder of the hot water demand.

We would like to understand more about EGI's consideration of community housing in its decision to exclude heat pumps.

*Questions:*

23) Please outline the dataset or sources that EGI consulted when including community housing in its decision to exclude heat pumps for low-income customers. Please identify sources including those not asked about below.

- a. Did EGI consult rent-geared-income regulations in its decision to exclude heat pumps for IQ customers including community housing organizations?
  - i. If so, what conclusions did EGI derive?

- b. Did EGI meet with HSC to understand the actual volume of heating, cooling, and water heating equipment approaching end-of-life in community housing during the 2027-2030 period?
    - i. If not, would EGI consider doing so?
  - c. What datasets or documentation on utility bill payment responsibility in community housing did EGI consult in its decision?
- 24) Please outline whether and how EGI considered the impact of excluding heat pumps in the context of actual and anticipated municipal cooling by-laws for rental housing.
- 25) Has EGI engaged in lifecycle cost analyses directly with community housing providers to determine those organizations' thresholds for acceptable electricity bill increases related to adding cooling through heat pump adoption?
- 26) Given the above-mentioned confirmation that community housing providers consider heat pumps as worthwhile even if electricity costs increase, what could a heat pump offering look like for our sector?

### **E-HSC-27,28,29**

**REF:** Ex. E, Tab 3, Schs. 2-3; & Ex. E, Tab 4, Sch. 4, page 6

*Preamble:*

It may not be well-known that HSC manages a building equipment information database for nearly 92,000 housing units and can access data on an additional 62,000+ units out of Ontario's approximate 250,000 community housing units or that HSC regularly conducts analyses to determine the magnitude of equipment approaching end of life across equipment and building types. For the nearly 154,000 units in our dataset, HSC found that there are over \$250 million in furnaces and hot water heaters and nearly \$80 million in make-up air units coming to end of life between 2027-2030 in community housing buildings. Respectively, these figures extrapolate to approximately \$420 million and \$125 million in end-of-life opportunities for the sector's approximate 250,000 housing units.

*Questions:*

- 27) Do the above end-of-life equipment examples change what EGI would budget for a heat pump offering for community housing for each of HWP and AHMR?
- 28) If EGI were to include a heat pump measure commensurate with the above-mentioned end-of-life equipment examples, what would the budgets look like for each of HWP and AHMR?

- 29) If EGI were to include a hybrid roof-top unit measure in the AHMR similar to that proposed for the Commercial/Industrial Direct Install Offering (Ex. E, Tab 4, Sch. 4, page 6), what would the budget look like?

### **E-HSC-30**

**REF:** Ex. E, Tab 3, Schs. 2-3

*Preamble:*

As noted above, HSC has access to building equipment data on nearly 154,000 of Ontario's approximately 250,000 community housing units. For the nearly 154,000 units in our dataset, we found there are over \$1 billion in windows and exterior doors coming to end of life in the 2027-2030 period. This extrapolates to approximately \$1.6 billion for the sector's approximate 250,000 housing units. It is well-known from building standards such as Passive House and Leadership in Energy and Environmental Design emphasize that tightening the building envelope through energy efficient window and door upgrades, insulation, and air sealing can reduce the energy demand associated with space heating such that space heating equipment can then be downsized. EGI's proposed AHMR and HWP offerings do not include window or door measures, except for the replacement of a broken window under HWP.

*Questions:*

- 30) Factoring in above end-of-life windows and doors example and the recognized relationship between reduced energy use for space heating and building envelope tightness, what would the budgets look like for each of AHMR and HWP if EGI were to include window and exterior door measures?
- a. Could EGI conduct a pilot to add building envelope and air tightness testing measures to AHMR Prescriptive and/or Custom projects to maximize gas savings?

### **E-FRPO/HSC-31**

**REF:** Ex. E, Tab 3, Schedule 1, page 4

*Preamble:*

In this reference, while categorizing the Income Qualified sector, EGI evidence asserts:

*MURB – This primarily includes purpose-built rental apartments, which make up a small percentage of the housing stock in urban areas like the Greater Toronto Area*

*(“GTA”). Rising rents have reduced the number of affordable units available to income qualified tenants.*

*Questions:*

- 31) Please provide a reference for the last sentence in the quoted evidence.
  - a. What implications are drawn from this sentence as it pertains to the Income Qualified program for MURB’s?

### **E-FRPO/HSC-32,33,34**

**REF:** EB-2021-0002 Ex. C, Tab 1, Sch. 1, page 21 & Ex. D, Tab 8, Sch. 1

*Preamble:*

“In the first reference, EGI evidence states: “Pilots and tests could be included within Resource Acquisition and Market Transformation programs and are necessary to evolve the current portfolio of DSM programs.”

We would like to understand EGI’s experience with pilot and tests during the last Framework period from 2022-2024.

*Questions:*

- 32) Please provide examples of tests in the previous framework. Please describe what was learned.
- 33) Please provide examples of pilots in the previous framework. Please describe what was implemented.
- 34) How would these types of tests and pilots be handled going forward with the inclusion of the Energy Innovation Fund? Please explain fully.