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May 21, 2026

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Ritchie Murray – Acting Registrar

Dear Mr. Murray:

**Re: LIEN and VECC Joint Interrogatories
Enbridge Gas Inc.’s Application for Multi-Year Natural Gas DSM Plan (2027-2030)
Board File No. EB-2025-0295**

Willms & Shier Environmental Lawyers LLP is legal counsel for the Low-Income Energy Network (“LIEN”).

In accordance with the OEB’s Decision on Issues List and Procedural Order No. 3 issued May 4, 2026 in the above referenced proceeding, LIEN and the Vulnerable Energy Consumers Coalition (“VECC”) enclose joint interrogatories below.

Yours truly,

Ali Naraghi
Associate

cc: Judy Simon (consultant for LIEN)
Shelley Grice (consultant for VECC)

1385-5105-1808, v. 1

EB-2025-0295

Enbridge Gas Inc.

**Application for Multi-Year Natural Gas Demand Side
Management Plan (2027-2030)**

LIEN/VECC Interrogatories May 21, 2026

B-LIEN/VECC-1

Ref: Exhibit B, Tab 1, Schedule 1, p. 6

Please expand Table 1 to include data for 2023, 2024, 2025 and 2026.

C-LIEN/VECC-2

Ref: Exhibit C, Tab 1, Schedule 4, Attachment 1, pp. 6-9

Regarding stakeholder consultation related to the proposed 2027-2030 DSM Plan and any future DSM Plan application,

- a) What are Enbridge Gas's plans for engaging with stakeholders, including intervenors to this proceeding, during the implementation of its DSM Plan?
- b) Does Enbridge Gas intend to report on progress and continual improvement as part of this stakeholder engagement? If so, how often will Enbridge Gas report on these matters (e.g. annually)?
- c) What are Enbridge Gas's plans for engaging with stakeholders, including intervenors to this proceeding, on the development of its next DSM Plan?
- d) How will Enbridge Gas ensure that it allows for timely and meaningful feedback from stakeholders on the development of its next DSM Plan?
- e) Does Enbridge Gas support the continuation of the Stakeholder Advisory Group ("SAG") during its 2027-2030 DSM Plan time period?
- f) What should the terms of reference and type of membership be for the SAG if the SAG is continued?

C-LIEN/VECC-3

Ref: Exhibit C, Tab 1, Schedule 5, p.15

Paragraph 47: Feedback heard from workshops and focus groups with stakeholders, including various housing organizations confirmed the effectiveness of bill inserts.

Please discuss Enbridge Gas’s evaluation and use of bill inserts to promote Enbridge Gas’s DSM programs during the 2027-2030 DSM term.

C-LIEN/VECC-4

Ref: Exhibit C, Tab 1, Schedule 5, Attachment 7

- a) Page 56: Please update with the latest Program Offerings and data.
- b) Page 68: Please provide the results for the years 2023, 2024 and 2025.
- c) Page 69: Please provide the results for the years 2023, 2024 and 2025.

C-LIEN/VECC-5

Ref: Exhibit C, Tab 1, Schedule 5, Attachment 8

Please provide the annual DSM forecast gas reductions (net cubic meter (m³) as % of prior years’ forecast sales volumes) for the years 2023 to 2030.

	2023	2024	2025	2026	2027	2028	2029	2030
Residential								
Income Qualified								
Commercial								
Industrial								
Portfolio without Large Volume (LV)								
Large Volume								
Portfolio with LV								

C-LIEN/VECC-6

Ref: Exhibit C, Tab 1, Schedule 6, p.11-12

Regarding Enbridge Gas's discussions with Natural Resources Canada ("NRCan") about the delivery of the Canada Greener Homes Affordability Program ("CGHAP") targeted at low-to-median income homeowners and tenants with no-cost home retrofits:

- a) What is the status of those discussions and is the program still targeted to launch in Ontario in 2026?
- b) How will Enbridge Gas ensure that this program is complementary to its proposed Residential and Income Qualified Programs for the 2027-2030 DSM Plan?
- c) If Enbridge Gas implements the CGHAP during part or all of the implementation period of the 2027-2030 DSM Plan and measure stacking is available for either or both the Residential and Income Qualified Programs, how will this stacking impact the forecast energy savings for each of the Residential and Income Qualified Programs as well as their respective TRC-Plus calculations and rate impact for residential customers?

D-LIEN/VECC-7

Ref: Exhibit D, Tab 1, Schedule 1, p.14

The new 12-year electricity Demand Side Management ("eDSM") Framework began in 2025 and will be delivered through a series of three-year program plans. The IESO's current eDSM plan started in 2025, with the next three-year eDSM plan term expected to cover 2028 to 2030.

Enbridge Gas is proposing a four-year term for this Application (2027 to 2030). Enbridge Gas sought and received OEB approval for a one-year extension of the 2023-2025 DSM Plan to continue through 2026.

Please discuss if Enbridge Gas considered proposing a further one-year extension of the 2026 DSM Plan into 2027 in order to align its 2028-2030 DSM Plan with the IESO's 2028-2030 eDSM plan term, and if not, why?

D-LIEN/VECC-8

Ref: Exhibit D, Tab 2, Schedule 1 pp. 6-9

Please identify and explain all modifications to the 2027 to 2030 scorecards compared to the existing 2026 scorecard for the following components: Metric, Metric Weighting, DSMI Allocation, Lower Band and Upper Band.

D-LIEN/VECC-9

Ref: Exhibit D, Tab 2, Schedule 1 p.10

Please expand Table 5 to include data for 2023, 2024, 2025 and 2026.

D-LIEN/VECC-10

Ref: Exhibit D, Tab 2, Schedule 2, p. 3

- a) Please provide the calculation for the Enbridge Gas data for 2024 and 2027 in Figure 1.
- b) Please update Figure 1 to reflect 2025 actuals.

D-LIEN/VECC-11

Ref: Exhibit D, Tab 2, Schedule 2, p. 4

The evidence states “Based on the average incentive of Package C participants, the cost in 2024 was \$8.24 per net m³ of natural gas saved. This means the incentive budget alone required to achieve 1% savings of residential volumes, estimated at 70 million m³, would be over \$575 million per year.”

- a) Please confirm Package C refers to Enbridge Gas non-owner-occupied customers.
- b) Please provide the \$575 million per year calculation.

D-LIEN/VECC-12

Ref: Exhibit D, Tab 2, Schedule 2, p. 8

Please expand Table 1 to include 2023, 2024, 2025 and 2026 data.

D-LIEN/VECC-13

Ref: Exhibit D, Tab 2, Schedule 2, p.8; Enbridge Gas December 18, 2025 Cover Letter, p.6

The cover letter indicates that changes to the 2027-2030 DSM Plan relative to the 2026-2030 DSM Plan result in a Residential Program budget reduction of 53%, from

\$651 million to \$309 million. The cover letter also indicates that changes to the 2027-2030 DSM Plan relative to the 2026-2030 DSM Plan result in an Income Qualified Program budget reduction of 44%, from \$224 million to \$126 million.

- a) Please provide a detailed chronological explanation for the \$342 million reduction in the Residential Program budget. In the response, please discuss any analysis and consultation undertaken.
- b) Please provide a detailed chronological explanation for the \$98 million reduction in the Income Qualified Program budget. In the response, please discuss any analysis and consultation undertaken.

D-LIEN/VECC-14

Ref: Exhibit D, Tab 2, Schedule 2, p. 9

Please provide Table 2 for 2023, 2024, 2025 and 2026 data.

D-LIEN/VECC-15

Ref: Exhibit D, Tab 2, Schedule 2, pp. 9-12; Exhibit D, Tab, 2 Schedule 3, pp.8-11; Exhibit D, Tab 3, Schedule 1, pp. 2-13

In a Microsoft Excel spreadsheet, for each DSM program in aggregate and each offering within each program for the 2026 DSM rollover year and each of 2027, 2028, 2029, and 2030, please provide the following:

- a) Budget
- b) Spend Ratio (\$ per m³)
- c) Scorecard target at 100% of target
- d) TRC-Plus Ratio
- e) PAC
- f) Residential rate impact for that year

D-LIEN/VECC-16

Ref. Exhibit D, Tab 2, Schedule 2, pp. 9-12; Exhibit D, Tab, 2 Schedule 3, pp. 8-11; Exhibit D, Tab 3, Schedule 1, pp. 2-13

In a Microsoft Excel spreadsheet for each DSM program in aggregate and for each offering within each program please provide the incremental positive or negative percent change and rationale for the change from 2026 DSM rollover year to 2027, 2027 to 2028, 2028 to 2029, and 2029 to 2030 for the following:

- a) Budget
- b) Spend Ratio (\$ per m³)
- c) Scorecard target at 100% of target
- d) TRC-Plus Ratio
- e) PAC
- f) Residential rate impact for that year

D-LIEN/VECC-17

Ref. Exhibit D, Tab 3 Schedule 1, pp. 2-5; Exhibit E, Tab 2 Schedule 2 p.7, Exhibit E, Tab 2, Schedule 7, pp. 1-4

Regarding the Residential Program, what are the TRC-Plus and PAC results for 2027 through to 2030 inclusive for each of the remaining Residential Program Offerings and the resultant Residential Program if the Education and Outreach Offering was eliminated and instead its budget was incorporated into:

- a) Single Measure Offering (Exhibit E, Tab 2, Schedule 3, pp. 1-4)
- b) Smart Home Offering (Exhibit E, Tab 2, Schedule 5, pp.1-4)
- c) What would the rate impact on residential customers be for the Residential Program for each of the Single Measure Offering and Smart Home Offering scenarios?

D-LIEN/VECC-18

Ref: Exhibit D, Tab 4, Schedule 1, pp. 2-3

- a) Page 2: Please provide the total number of actual FTEs by Program for the years 2023 to 2025 and the forecast for 2026 to 2030.
- b) Page 3: Please provide the DSM Staff budget (\$) for each of the years 2023 to 2025 and 2026 to 2030 forecast.

D-LIEN/VECC-19

Ref: Exhibit D, Tab 8, Schedule 3, p. 6

Enbridge Gas indicates successful Energy Innovation Fund projects will be selected based on:

- Technical feasibility;
- Addressing specific market gaps;

- Cost-Effectiveness;
- Natural gas savings potential;
- Scalability and replicability;
- Alternative funding sources or co-funding potential;
- Expertise of group submitting proposal; and,
- References (external support of project).

Please discuss how Enbridge Gas scores the above parameters and if Enbridge Gas has assigned different weights to each parameter.

D-LIEN/VECC-20

Ref: Exhibit D, Tab 10, Schedule 1, Attachment 2, p.1

Please confirm if the data in Table 1 also applies to the 2026 DSM program. If not, please explain the differences.

E-LIEN/VECC-21

Ref. Exhibit E, Tab 2, Schedule 1, p. 12

Enbridge Gas has developed the proposed Residential Program based on the following design principles:

- Broaden participation and increase savings
- Incorporate flexibility into offerings
- Focus on accessibility and equity
- Advance energy literacy
- Promote envelope upgrades before mechanicals
- Support ongoing collaboration and partnerships
- Attract increased market activity
- Work towards scalability

a) Are these design principles meant to apply to the income-qualified subsector of the residential sector? If not, what are the design principles for the low-income income-qualified sector?

b) Given that affordability is a key concern of the Ontario government and keeping energy costs low for families, businesses and industry is one of the four principles central to the government's energy plan, why is increasing participation in the Residential Program and Income Qualified Program, missing from the list of design principles?

E-LIEN/VECC-22

Ref: Exhibit E, Tab 2, Schedule 1, p. 14; Enbridge Gas December 18, 2025 Cover Letter p.6; EB-2021-0002 Revised Decision November 15, 2022 Schedule C

- a) The Residential Beyond Building Code Offering was removed. Please provide a detailed chronological explanation of why this program was removed.

Please provide the impact on the DSM budget, annual natural gas savings, TRC-Plus, PAC and rate impact by removing the Residential Beyond Building Code Program from the 2027-2030 DSM Plan.

- b) With respect to the EB-2021-0002 Revised Decision November 15, 2022 Schedule C, please provide the Beyond Building Code Program Scorecard, for 2023, 2024, 2025 and progress to date in 2026.

E-LIEN/VECC-23

Ref: Exhibit E, Tab 2, Schedule 1, pp. 14-15

- a) For each of the Residential Program Offerings in Table 6, please provide the forecast participation levels by offering for each of the years 2026 to 2030.
- b) Please provide the historical participation levels for each of the Residential Offerings for each of the years 2023 to 2025.
- c) For each of the Residential Program Offerings in Table 6, please provide the quantity of forecast units by offering element for each of the years 2026 to 2030 where applicable.

E-LIEN/VECC-24

Ref. Exhibit E, Tab 2, Schedule 2, p.4, Exhibit E, Tab 2, Schedule 6, pp.1-5

Regarding the draft proofing kit (weatherstripping, rope caulking, and outlet caskets) as a measure in the Moderate Income Direct Install Offering of the Residential Program:

- a) What would the resultant offering costs, gas savings, TRC-Plus, and PAC be for each of 2027 through to 2030 inclusive if the draft proofing kit were included as a free direct install measure?
- b) What would the overall impact to the Residential Program – costs, gas savings, TRC-Plus and PAC and residential ratepayer impact - be for each of 2027 through to 2030 inclusive?

- c) If there were an incentive, say \$50.00 per participant, for participants that installed the measures contained in the no cost draft proofing kit verified through the E-Assessment (post-installation), what would the impact on the Whole Home Offering – program costs, gas savings, TRC-Plus and PAC - be for each of 2027 through to 2030 inclusive and the overall impact to the Residential Program – program costs, gas savings, TRC-Plus and PAC, and residential ratepayer impact?

E-LIEN/VECC-25

Ref. Exhibit E, Tab 2, Schedule 2, p.4, Exhibit E, Tab 2 Schedule 2, pp.1-7

Regarding the Whole Home Offering of the Residential Program, if there were an incentive, say \$50.00 per participant, for participants that installed the measures contained in the no cost draft proofing kit verified through the E-Assessment (post-installation), what would the impact on the Whole Home Offering be regarding program costs, gas savings, TRC-Plus and PAC for each of 2027 through to 2030 inclusive and the overall impact to the Residential Program for program costs, gas savings, TRC-Plus and PAC, and residential ratepayer impact?

E-LIEN/VECC-26

Ref. Exhibit E Tab 2 Schedule 2, p.4. Exhibit E Tab 3 Schedule 2, pp.1-7

Regarding Home Winterproofing Offering of the Income Qualified Program,

- a) What would the resultant Offering costs, gas savings, TRC-Plus and PAC be for each of 2027 through to 2030 inclusive if outlet caskets were added?
- b) What would be the overall impact to the Income Qualified Program regarding costs, gas savings, TRC-Plus and PAC and residential ratepayer impact be for each of 2027 through to 2030 inclusive?

E-LIEN/VECC-27

Ref. Exhibit E Tab 2 Schedule 2, p. 7

- a) Does Enbridge Gas now provide assistance to its customers that use the on-line questionnaire on the Enbridge Gas website to help customers identify conservation opportunities and make recommendations relevant to offerings and incentives? If yes, how successful has this been for customers then accessing Enbridge Gas's Residential Program Offerings? If no, why not?

- b) Would Enbridge Gas be willing to use this on-line questionnaire as an offering as part of Education and Outreach Offering or another offering of the Residential Program with more aggressive customer support and engagement? Should such an offering be used to complement or substitute for the Home Energy Reports? If yes, why, and if no, why not?

E-LIEN/VECC-28

Ref. Exhibit E Tab 2, Schedule 2, pp.1-7

Regarding Whole Home Offering of the Residential Program,

- a) How does Enbridge Gas plan to encourage participants to install the measures in the drafting proofing kit?
- b) Would Enbridge Gas be willing to include an incentive per participant that was verified at the E-Assessment to encourage participants to install the measures in the draft proofing kit? If not, why not?

E-LIEN/VECC-29

Ref: Exhibit E, Tab 3, Schedule 1, pp.13-14

- a) For each of the Income Qualified Program Offerings in Table 2, please provide the forecast participation levels by offering for each of the years 2026 to 2030.
- b) Please provide the historical participation rates for each of the Low Income Offerings for each of the years 2023 to 2025.
- c) For each of the Income Qualified Program Offerings in Table 2, please provide the quantity of forecast units by offering element for each of the years 2026 to 2030, where applicable.
- d) Please provide the incremental budgets and forecast quantities for new windows and heat reflector panels.

E-LIEN/VECC-30

Ref. Exhibit E, Tab 2, Schedule 7, pp. 1-4, Exhibit E, Tab 2, Schedule 1 Plus Attachment, p.15, Exhibit E Tab 2, Schedule 2, p. 3

Regarding the Education and Outreach Offering of the Residential Program:

- a) Please describe what research Enbridge Gas has relied on to support inclusion of this offering in its Residential Program and provide any related public reports.
- b) Has either Enbridge Gas or Union Gas offered a home-energy-report-like program in the past as part of its DSM portfolio? If so, what were results of this offering, and why was it discontinued?
- c) Has Enbridge Gas investigated the pilot programs IESO (or its predecessor) funded (e.g., Toronto Hydro, Hydro One) for similar behavioural programs with and without home energy reports and the associated results? If so, is Enbridge Gas aware of why the IESO has not offered such a program as a provincial offering?
- d) Has Enbridge Gas investigated IESO's interest in offering this Education and Outreach Offering as a joint natural gas-electricity offering with the IESO as part of the one-window approach? If so, what were the results? If not, why not?
- e) Would Enbridge Gas be willing to include offering free in-person home D-Assessments performed by Registered Energy Advisors Enbridge Gas uses for the Whole Home Offering assessments as a limited time offer each year as part of the Education and Outreach Offering or another offering within the Residential Program? If yes, why, and if no, why not? Would this limited time offering be more effective than annual Home Energy Reports in increasing awareness and encouraging participation in residential retrofits? If yes, why and if no, why not?

E-LIEN/VECC-31

Ref. Exhibit E Tab 2, Schedule 6, pp.1-5, Exhibit E, Tab 2, Schedule 2. P. 4

Regarding Moderate Income Direct Install Offering of the Residential Program,

- a) For potential participants Enbridge Gas plans to identify through use of its data driven tools and other data sources and analytics to determine concentrated areas of moderate income with older vintage homes such that the areas have a high propensity of customers that meet the moderate-income threshold, how will Enbridge Gas ensure that it does not include higher income families in this Offering?
- b) Why is Enbridge Gas not requiring moderate income participants to provide proof of income (e.g. appropriate lines on latest income tax filing)?

- c) What is the magnitude of the risk of including higher income families in this Offering?
- d) Why has Enbridge Gas not included the free direct install of the draft proofing kit (weatherstripping, rope caulking and outlet caskets) as a measure in this Offering?
- e) Would Enbridge Gas be willing to include this as a direct install measure with a leave-behind brochure on how to install these measures, and their energy and financial savings as well as other residential energy saving tips?

E- LIEN/VECC-32

Ref. Exhibit E Tab 3, Schedule 2 pp.1-7

Regarding Home Winterproofing Offering of the Income Qualified Program, “Enbridge Gas notes that there is an important policy consideration for the income qualified space regarding electric heat pump technology, which was discussed with the DSM Stakeholder Advisory Group (“SAG”) during intervenor engagement sessions (Exhibit C, Tab 1, Schedule 5). While electric heat pumps reduce natural gas and offer efficiency gains, they involve fuel switching and can increase electricity costs, especially if the home has 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.” (Exhibit E, Tab 3, Schedule 2, p.5):

- a) Please provide any empirical analysis undertaken by Enbridge Gas to support the above conclusion.
- b) Please summarize the SAG’s perspective/position regarding the implementation of electric heat pumps in the income-qualified sector.
- c) In the development of Enbridge Gas’s rationale for the exclusion of heat pumps in the income-qualified sector, did Enbridge Gas conduct desktop or other research regarding heat-related morbidity and mortality in Ontario? If yes, please provide the public reports that Enbridge Gas relied upon.
- d) Is Enbridge Gas aware of the City of Toronto’s Heat Relief Strategy, and that this report indicates that in Toronto “Communities with lower socio-economic factors may face higher temperatures because their neighbourhoods have more dense concrete and pavement and less greenspace or may be less likely to have air conditioning?” (City of Toronto, 2026 Heat Relief Strategy, May 2026, p.3.). If yes, how was this considered in

the decision to remove heat pumps from this Offering's list of eligible measures?

- c) If cold-climate air source heat pumps were to continue to be included in this Offering, is Enbridge Gas willing to provide its income-eligible customers with information regarding the use of heat pumps for air conditioning such as increased comfort, prevention of heat stroke illness and death and the increase in electricity costs that will result from accessing these benefits, prior to the customer making a decision regarding the approval of the installation of the eligible heat pump in the customer's home?

- d) Why does the list of eligible measures not include outlet caskets? Would Enbridge Gas be willing to include the free of charge direct installation of outlet caskets? If so, why? If not, why not?

E- LIEN/VECC-33

Ref. Exhibit F, Tab 1, Schedule 1 pp.1-7

Enbridge Gas provides the residential rate impacts for the 2027 Plan relative to 2026. Please restate the bill impacts for 2027 if there was a rollover of the 2026 DSM Plan into 2027, assuming a 2% annual proxy inflation factor on incentive budget components and a 1.72% annual proxy inflation factor on non-incentive budget components (2% proxy inflation - 0.28% efficiency stretch factor).

1382-4840-4000, v. 4