

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Schedule B, as amended (the “**Act**”);

AND IN THE MATTER OF an application by Enbridge Gas
Inc. (“**EGI**”) pursuant to Section 36(1) of the Act, for an order
or orders approving its Demand Side Management Plan for
2027-2030.

EB-2025-0295

INTERROGATORIES

OF

THREE FIRES GROUP INC.

(“TFG”)

AND

MINOGI CORP.

(“MC”)

May 21, 2026

Question: C-TFG/MC-1.

Reference: • Exhibit C, Tab 1, Schedule 5

- a) Please describe all engagement undertaken by EGI with First Nations, First Nation-owned entities, Indigenous organizations, and Indigenous customers in developing the 2027-2030 DSM Plan (the “**Plan**”).
- b) For each engagement activity identified in response to part a), please provide:
 - (i) the date;
 - (ii) the participants;
 - (iii) whether the engagement was undertaken through the Indigenous Working Group (“**IWG**”), a stakeholder session, bilateral engagement, customer outreach, or another forum;
 - (iv) the DSM programs or issues discussed; and
 - (v) any specific feedback received regarding barriers to participation, program design, delivery, eligibility, incentives, or customer experience.
- c) Please identify all changes, if any, made to the Plan as a result of feedback from First Nations, First Nation-owned entities, Indigenous organizations, Indigenous customers, or the IWG. If no changes were made, please explain why.
- d) Is EGI able to commit to continue engaging with the IWG, and interested First Nations on DSM program design and delivery (i) during the DSM term and (ii) as part of developing EGI’s next DSM plan.
- e) Please explain whether EGI would be willing to provide an annual Indigenous DSM participation report to the IWG that includes, at a minimum:
 - (i) the number of participating First Nation communities;
 - (ii) the number of participating customers, homes, buildings, facilities, or projects;
 - (iii) program participation by sector or program stream;
 - (iv) incentives paid;
 - (v) annual and lifetime natural gas savings;
 - (vi) barriers identified during the year; and
 - (vii) actions taken or proposed to address those barriers.

Question: C-TFG/MC-2.

Reference: • Exhibit C, Tab 1, Schedule 5

- a) Please identify each meeting of the IWG at which DSM programming, DSM participation, DSM barriers, energy efficiency, energy affordability, or the DSM Plan was discussed.
- b) For each meeting identified in response to part a), please provide:
 - (i) the DSM-related materials provided by Enbridge Gas;
 - (ii) a summary of the DSM-related discussion;
 - (iii) any action items or follow-up commitments; and
 - (iv) the current status of each action item or follow-up commitment.
- c) Please provide copies of any DSM-related presentations, briefing notes, meeting summaries, or written materials provided to the IWG.
- d) Please describe how EGI intends to incorporate any feedback received through the IWG in delivering the Plan.

Question: D-TFG/MC-3.

Reference: • Exhibit D, Tab 1, Schedule 1

- a) Please provide, for each year from 2021 to 2025, the number of First Nation communities that participated in any DSM program.
- b) For each year from 2021 to 2025, please provide the number of DSM program participants located in, or associated with, each First Nation community, broken down by program and customer class (residential, income-qualified, commercial, industrial, large volume etc.).
- c) For each First Nation community identified in response to part b), please provide the total number of participating homes, customer accounts, buildings, facilities, or projects, as applicable.
- d) For each First Nation community identified in response to part b), please provide the total annual and lifetime natural gas savings, incentive amounts, and DSM budget expenditures associated with those participants or projects.
- e) If EGI does not track participation by First Nation community, please explain:
 - (i) why not;
 - (ii) what information EGI does track that could identify or approximate participation by First Nation communities or Indigenous customers; and
 - (iii) whether EGI is able to begin tracking this information during the 2027-2030 term or a subsequent DSM plan period.

Question: E-TFG/MC-4.

- Reference:
- Exhibit E, Tab 3, Schedule 2
 - Exhibit C, Tab 1, Schedules 3-5

- a) Please identify all barriers to participation in DSM programs that EGI has identified for First Nation communities, First Nation-owned entities, and Indigenous customers.
- b) For each barrier identified in part a), please indicate:
 - (i) how the barrier was identified;
 - (ii) whether the barrier applies primarily to on-reserve customers, off-reserve Indigenous customers, First Nation-owned commercial or institutional customers, or another customer segment;
 - (iii) whether the barrier is addressed in the Plan; and
 - (iv) the specific program design, delivery, outreach, incentive, or administrative measure proposed to address the barrier.
- c) Please identify any barriers raised by First Nations, Indigenous customers, or the IWG that the Plan does not address and explain why not.
- d) Please describe how EGI will measure whether the Plan reduces barriers to participation by First Nation and Indigenous customers over the 2027-2030 term.

Question: **E-TFG/MC-5.**

Reference: • Exhibit E, Tab 3, Schedule 1

- a) Please identify any income verification, housing-status, ownership, tenancy, landlord-consent, or Band documentation requirements that may affect participation by First Nation customers, including on-reserve households in the Income Qualified Program and/or other applicable residential program offerings.
- b) Please explain whether EGI has assessed whether the eligibility and documentation requirements for the Income Qualified Program may create barriers for First Nation or Indigenous customers.
- c) Please describe any alternative eligibility pathways, simplified application processes, or community-based enrollment approaches that EGI has considered or proposes to use for First Nation or Indigenous customers.
- d) Please explain whether EGI has considered working directly with First Nation governments, housing departments, Band councils, Indigenous housing providers, or Indigenous service organizations, other than those identified in the Plan, to identify eligible customers and deliver the Income Qualified Program.

Question: E-TFG/MC-6.

Reference: • Exhibit E, Tab 2, Schedule 7

- a) Please describe EGI's proposed strategy for increasing awareness and participation in DSM programs among First Nation communities and Indigenous customers during the Plan term.
- b) Please identify all proposed outreach channels, materials, events, partnerships, or campaigns specifically directed to First Nation or Indigenous customers.
- c) Please indicate whether EGI proposes to develop First Nation-specific or Indigenous-specific DSM outreach materials. If yes, please provide details. If no, please explain why not and whether EGI would consider working with the IWG to develop such materials.
- d) Please provide any targets, metrics, or expected outcomes associated with EGI's strategy to increase First Nation and Indigenous customer engagement.
- e) Please provide all metrics EGI currently uses, or proposes to use, to track participation by First Nation, First Nation-owned entities, and Indigenous customers in DSM programs.
- f) Please explain whether Enbridge Gas tracks any of the following:
 - (i) participation by First Nation;
 - (ii) participation by on-reserve and off-reserve Indigenous customers;
 - (iii) participation by First Nation-owned businesses or institutions;
 - (iv) participation by Indigenous housing providers;
 - (v) incentives paid to First Nation or Indigenous participants;
 - (vi) natural gas savings achieved by First Nation or Indigenous participants; and
 - (vii) non-participant inquiries or incomplete applications from First Nation or Indigenous customers.
- g) If EGI does not track any of the items listed in part f), please explain why not.

Question: **E-TFG/MC-7.**

Reference: • Exhibit E

- a) Please describe how EGI assesses contractor, auditor, energy advisor, and installer availability for DSM program delivery in First Nation communities.
- b) Please identify any known gaps in contractor or delivery capacity affecting First Nation communities.
- c) Please describe any strategies EGI proposes to address contractor or delivery capacity barriers for First Nations and on-reserve customers during the DSM term.
- d) Please explain whether Enbridge Gas has considered:
 - (i) training or qualifying Indigenous contractors or energy advisors;
 - (ii) partnering with First Nation-owned businesses;
 - (iii) supporting bundled or community-wide delivery models; and
 - (iv) coordinating audits and installations across multiple homes or buildings in a First Nation community.

If no, please explain why not and whether EGI is capable of undertaking any and/or all of the above during the DSM term.

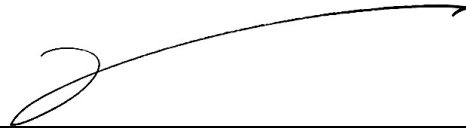
Question: E-TFG/MC-8.

Reference:

- Exhibit E, Tab 2
- Exhibit E, Tab 3
- Exhibit E, Tab 4

- a) Please describe how EGI has assessed the suitability of proposed DSM measures for homes and buildings in First Nation communities.
- b) Please identify any DSM measures that EGI considers particularly suitable for First Nation homes or community buildings, and explain why.
- c) Please identify any DSM measures that may be less suitable or more difficult to implement in First Nation homes or community buildings, and explain why.
- d) Please describe whether EGI has considered enhanced pre-retrofit assessments, health and safety remediation coordination, or bundled measure approaches for First Nation homes or community buildings.
- e) Please explain how EGI proposes to address circumstances where a First Nation home or building could benefit from DSM programming but cannot proceed because of prerequisite repair, health and safety, or building condition issues.

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
21st day of May, 2026



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