

MICHAEL R. BUONAGURO

Barrister and Solicitor

24 HUMBER TRAIL
TORONTO, ONTARIO, M6S 4C1
P: (416) 767-1666
F: (416) 767-1666
EMAIL: mrb@mrb-law.com

May 21, 2026

Mr. Ritchie Murray
Acting Board Registrar
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Mr. Murray,

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

Please find enclosed the interrogatories submitted on behalf of the Ontario Greenhouse Vegetable Growers (OGVG).

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

Yours very truly,



Michael R. Buonaguro
Encl.

EB-2025-0295

Enbridge Gas Inc.

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

**INTERROGATORIES OF THE ONTARIO GREENHOUSE VEGETABLE
GROWERS**

May 21, 2026

Michael Buonaguro
Counsel
Ontario Greenhouse Vegetable Growers
24 Humber Trail
Toronto, Ontario
M6S 4C1

Phone 416-767-1666

Email: mrb@mrb-law.com

C-OGVG-1

Ref: Exhibit C Tab 1 Schedule 1 Page 1
EB-2025-0189, Exhibit I.OGVG-1 a)

Preamble: EGI proposes to maintain the existing DSM Framework, subject to any modifications approved in this application.

- a) Please confirm that under the existing framework EGI can spend 15% more than the approved DSM budget on incremental program expenses.
- b) Please confirm that under the existing framework the 15% limit on overall overspend does not operate as a limit on the amount of DSM spending allocated to any specific customer class, as demonstrated by the increase in spending on the M7 class in 2023 by over 100%.
- c) Please provide EGI's position on a possible further restraint that the increase in spending allocated to a particular rate class relative to the approved spending for that class be limited to 15%, to avoid large increases in spending within rate classes as was experienced by the M7 rate class in 2023.

E-OGVG-2

Ref: Exhibit E Tab 5 Schedule 2 Page 8

Preamble: Enbridge Gas may implement a versatile bonus incentive design strategy that considers various options, such as first-time bonus incentives, tiered incentives, and other recommendations from the SAG, with the goal of encouraging broader participation and/or promoting the adoption of underperforming or deep energy savings measures. [This quote is in the context of the industrial custom offering).

- a) Does Enbridge Gas propose to maintain versatility with respect to the provision of enabling activity incentives within the industrial custom offering in the same way it proposes to maintain versatility with respect to implementation incentive design? For example, does Enbridge Gas propose to retain the discretion to fund 100% of an enabling activity for an industrial customer that has not participated in DSM programming for an extended period of time as a way to demonstrate to that customer the potential for gas savings through the DSM program?

E-OGVG-3

Ref: Exhibit E Tab 6 Schedule 1 Pages 8-10

Preamble: With respect to the proposed Large Volume Opt-out process, it is unclear to OGVG how that process is translated into the recovery of DSM costs in rates.

- a) Please confirm that where a rate class includes both customers that have opted out of the Large Volume Program and customers that have either remained eligible for the Large Volume Program or do not qualify for the Large Volume Program, the recovery of DSM costs from that class will be through a single rate that recovers the total DSM costs allocated to that class to be recovered from all customers in that class. If not confirmed, please explain how EGI proposes to recover DSM costs from classes that contain both customers that have opted out of the Large Volume Program and customers that remained in the program and/or are delivered DSM programming through another program, most likely the industrial custom offering.

F-OGVG-4

Ref: Exhibit F Tab 1 Schedule 3 Page 1
EB-2025-0189, Exhibit I.OGVG-1a)

Preamble: These questions seek information concerning the penetration of EGI's DSM programming in the contract rate classes over the most recent plan period. OGVG is seeking to establish whether or not EGI has been able to provide DSM programming to most if not all of its contract rate customers within the term of its approved DSM plan such that, with few exceptions, EGI's contract rate customers are experiencing net savings as a result of EGI's DSM programming.

- a) For each contract rate class, for the years 2021 to 2025, please provide the following information in table form:
- i) The total number of customers in the rate class in each year.
 - ii) The total DSM costs recovered from the rate class in each year, including amounts embedded in base rates and amounts recovered through deferral and variance accounts (or for years where disposition has not yet been applied for the forecast amounts to be recovered through deferral and variance accounts).
 - iii) The total persistent DSM related savings experienced by contract customers in that year, both volumetrically and based on avoided commodity costs (please either exclude carbon tax related savings, or account for carbon tax savings separately). Please do not include avoided EGI charges as savings, as those costs are ultimately recovered through the LRAM. Please do include all savings persisting from previous year DSM activities.
 - iv) The total number of customers in the rate class that were DSM participants in each year.
 - v) The total number of greenhouse customers in each rate class.

- vi) The total number of greenhouse customers that were DSM participants in each year, split between those that participated in the industrial custom offering and those participating in other offerings.
 - vii) The total number of customers in each contract rate class that, as of the date of this answer, have not been a DSM participant in the 2021 to 2026 period.
 - viii) The forecast number of DSM participants in 2026 and 2027 that underpin the forecast allocation of DSM costs to each class.
- b) For the M7 rate class, for which EGI is proposing a 125% increase in DSM budget relative to 2026, please quantify how many times the average M7 customer will have to be a participant in order to exhaust the proposed DSM spending from 2027 to 2030, given that there are only approximately 70 customers in the class, and that in 2023 there were 32 participants, 27 of them in the industrial custom offering, based on a program spend of only \$3,586,630 (it appears to OGVG that, roughly speaking, the increase in DSM budget allocated to the M7 rate class from 2023 actual to 2027 proposed will require essentially every M7 customer to participate in the industrial custom offering every year from 2027 to 2030 in order to utilize the proposed budget). Please explain why EGI believes the proposed level of repeat participation over the 2027 to 2030 period is reasonable and sustainable.