

May 21, 2026

Mr. Ritchie Murray  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27th Floor  
Toronto, ON M4P 1E4

**Independent Electricity System Operator**

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[www.ieso.ca](http://www.ieso.ca)

Dear: Mr. Murray

**Re: Ontario Energy Board File No.: EB-2025-0295  
Enbridge Gas Inc – 2027-2030 Demand Side Management (“DSM” Plan)**

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Pursuant to the Ontario Energy Board’s May 4, 2026, Procedural Order No. 3, please find enclosed the Interrogatories of the Independent Electricity System Operator in the above-noted proceeding.

Sincerely

*Carrie Aloussis*

Carrie Aloussis  
Senior Manager, Regulatory Affairs

cc. via email:

Haris Ginis, Enbridge Gas

Dennis O’Leary (Aird & Berlis LLP. Enbridge Gas Counsel)

EB-2025-0295 Intervenors

## **IESO INTERROGATORIES**

### **IESO-1:**

**Reference: (1) Exhibit C, Tab 1, Schedule 1, pp. 6-7.**

**(2) Exhibit C, Tab 6, Schedule 6, p. 1.**

### **Preamble:**

**At Exhibit C, Enbridge Gas sets out its proposed modifications to the DSM Framework that it indicates supports its 2027-2030 DSM Plan. Among other things, Enbridge Gas's proposal includes a modification to the DSM Framework's current definition of "Attribution" as it relates to programs delivered jointly between Enbridge Gas and the IESO. Enbridge Gas's proposed revision is provided at Reference 1. The DSM Framework's current definition is found at Reference 2.**

**For clarity, both Enbridge's current and proposed "Attribution" definitions have been excerpted and shown below:**

### **Current Definition**

*For electricity CDM and natural gas DSM programs jointly delivered with the IESO (or in coordination with an LDC), all the natural gas savings should be attributed to Enbridge Gas and vice versa for electricity savings.*

### **Enbridge Gas's Proposed Definition**

*For electricity conservation programs and natural gas DSM programs jointly delivered with the IESO (or in coordination with an LDC), for the purpose of scorecard results, all the natural gas savings should be attributed to Enbridge Gas and vice versa for electricity savings. This represents a continuation of the simplified approach adopted in the 2006 Generic Proceeding and continued through to the 2015-2020 DSM Guidelines.*

### **Questions:**

- a. Enbridge Gas indicates that its proposed definition would apply solely to scorecard results. The IESO interprets this to mean that results for jointly delivered programs reported through other required mechanisms will be determined using a different methodology (e.g., results presented in DSM Annual Reports prepared by the Evaluation Contractor).
  - i. Please confirm whether Enbridge Gas expects the results of jointly delivered programs reported in DSM Annual Reports or other formal reporting to be determined using an alternative attribution methodology.

- ii. If applicable, please describe the alternative attribution methodology that Enbridge Gas considers appropriate, including whether Enbridge Gas would rely on the Evaluation Contractor for such determinations.
- b. If different from Enbridge Gas's responses to part a. above, please describe how Enbridge envisions its proposal would attribute the savings generated by a DSM program jointly delivered with a local electricity or natural gas distribution company (LDC), where Enbridge and the LDC have entered into an agreement to jointly deliver the program.

**IESO-2:**

**Reference: (1) Exhibit C, Tab 1, Schedule 6.**

**Preamble:**

**At Reference 1, Enbridge Gas describes the various programs that are currently, or are being considered for, joint delivery between the IESO and Enbridge.**

**Questions:**

- a. Please comment on what actions Enbridge Gas expects to take if its program budgets for a current or future joint initiative are exhausted prior to a program's end date . Please describe Enbridge Gas's expected response generally, as well as under a specific scenario where budget exhaustion results from program over-performance against forecast.

Please assume the IESO continues to make its agreed-to share of funding available for programs that overperform (i.e., that the IESO will allocate additional funds to cover the IESO's agreed-to share of program costs if IESO budgets are exhausted mid-stream).

**IESO-3:**

**Reference: (1) Exhibit D, Tab 9, Schedule 1.**

**Preamble:**

**At Reference 1, Enbridge states that the OEB will fulfill the following evaluation activities related to Enbridge Gas's DSM program: impact evaluations, annual verification of Enbridge Gas's DSM results, and Technical Resource Manual updates. At the same reference, Enbridge Gas states that it will be accountable to complete program process evaluations.**

**Questions:**

- a. Please describe Enbridge Gas's expectations with respect to the roles of Enbridge Gas, OEB staff, the Evaluation Advisory Committee, and the IESO during process evaluations conducted for jointly delivered initiatives.

**IESO-4:**

**Reference: (1) Exhibit E.**

**Preamble:**

**At Reference 1, Enbridge Gas describes the complement of programs proposed by Enbridge for delivery during the course of the 2027-2030 DSM Plan. These descriptions identify that many of Enbridge's proposed programs will offer incentives for electrification measures (e.g., electric heat pumps).**

**Questions:**

- a. Please confirm whether electrification measures will be included in measures eligible for participant incentives through the industrial custom program.
  - i. If applicable, please identify the electrification measures Enbridge Gas anticipates to include in the program.
  - ii. If applicable and available, please provide a volume forecast for each type of electrification measure that Enbridge Gas anticipates incenting through the industrial custom program.
  
- b. The number and location of electrification measure installations resulting from residential, commercial and industrial initiatives may serve as important inputs into various IESO activities, including those related to ongoing bulk and regional electricity system planning. Please confirm that Enbridge intends to share details of the various initiatives as part of your participation with the IESO in regional and bulk planning.