

May 21, 2026
Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Mr. Murray:

EB-2025-0295 – Enbridge Gas Distribution Inc. – 2027-2030 Demand Side Management Plan - CCC Interrogatories

Please find, attached, the interrogatories of the Consumers Council of Canada for Enbridge Gas Distribution Inc. pursuant to the above-noted proceeding.

Please feel free to contact me if you have questions.

Yours truly,

Julie E. Girvan

Julie E. Girvan

INTERROGATORIES FOR ENBRIDGE GAS DISTRIBUTION INC.

FROM THE CONSUMERS COUNCIL OF CANADA

RE: EB-2025-0295

2027-2030 DEMAND SIDE MANAGEMENT PLAN

A-CCC-1

Exhibit A/T2/S1

In its Application Enbridge Gas has stated that to avoid any interruption to DSM programming in late 2026 and into 2027, Enbridge Gas requests final approval for this Application by September 30, 2026. The request is now October 30, 2026. CCC notes that the Proposed Procedural Timeline (Table 1) is not consistent with the current timeline. Please explain, in detail, what Enbridge Gas will do with respect to each of its DSM programs in the absence of a Decision by the OEB by October 30, 2026. Would all programs be affected? Please explain. How would program costs would be affected?

B-CCC-2

Exhibit B/T1/S1/p. 1

The evidence states that, "It is necessary that any multi-year DSM Plan approved by the OEB aligns with provincial public policy, particularly the Government of Ontario's Integrated Energy Plan (IEP), which emphasizes an affordability-first approach that centres on customer choice and recognizes the critical role of natural gas in Ontario's energy mix":

- a) Please provide all correspondence between the Government of Ontario and Enbridge Gas regarding its Integrated Energy Plan. Please include any Power Point presentations;
- b) Please provide all correspondence between the Government of Ontario and Enbridge Gas regarding its proposed DSM Plan. Please include any Power Point presentations;
- c) Please indicate whether Enbridge Gas has sought funding from the Government of Ontario to support its DSM Programs. If it has not sought funding please explain why. If it has sought funding what has been the response?

B-CCC-3

Exhibit B/T1/S1

In the development of its plan Enbridge Gas undertook a residential customer survey. Please provide the residential customer survey referred to.

B-CCC-4

Exhibit B/T1/S1/p. 6

Enbridge Gas has set out in Table 1 – Total Budgets and Net Annual Natural Gas Savings Targets as a Percentage of Forecasted Natural Gas Sales. Does the Total Budget Envelope include all costs which Enbridge Gas is seeking recovery for in each year? If not, what costs have been excluded? Please provide those costs for each year 2027-2030.

C-CCC-5

Exhibit C/T1/S1/p. 4

With respect to scorecards, Enbridge Gas is proposing targets for metrics specified across defined scorecards. Three levels of achievement will be established for each individual metric on a given scorecard: one at 70%, 100% and 130%. No shareholder incentive will be paid on a given scorecard for achieving a scorecard weighted result of less than 70%. 0-100% of the incentive will be awarded for achievement from 70%-100% and 100%-200% of the incentive will be awarded for achievement from 100%-130%.

- a) Please explain why Enbridge Gas should receive an incentive for meeting less than 100% of its proposed targets?
- b) How did Enbridge Gas determine that 70% of the proposed target was an appropriate threshold for the incentive?
- c) Can Enbridge Gas provide examples of incentive mechanisms similar to this that are applied in other jurisdictions?

C-CCC-6

Exhibit C/T1/S1/p. 9

The evidence states, “When new DSM measures are introduced, and there is not sufficient research available to support a more informed net-to-gross adjustment, a NTG adjustment of 0.80 will be deemed for application to results until a NTG value is established by the Evaluation Advisory Committee.”:

- a) How did Enbridge Gas arrive at this NTG adjustment?
- b) Please provide examples of other jurisdictions that use this approach;
- c) Who is currently sitting on the Evaluation Advisory Committee and is this expected to change over the course of the plan? Please explain;
- d) Who is the current Evaluation Contractor and is this expected to change over the course of the plan?

C-CCC-7

Exhibit C/T1/S3

What was the total cost of the Achievable Potential Study and how were those costs recovered? Was the contractor obtained through an RFP process? If not, why not?

C-CCC-8

Ex. C/T1/S4

With respect to the Stakeholder Advisory Group:

- a) Please provide a complete list of all original and current Stakeholder Advisory Group members and who they represented. Were residential members represented? If not, why not?
- b) Who represented ratepayers?
- c) Who represented environmental interests?
- d) Who did Ms Lontoc represent? Please confirm she was a former Enbridge Gas employee.
- e) Enbridge Gas formally engaged with the SAG over 38 meetings from April to October 2024 and engaged with the SAG to discuss, provide input on and review the 2024 Achievable Potential Study. What was the overall cost of the SAG during this period and how were those costs recovered? Were those costs borne by Enbridge Gas ratepayers? Please explain.

C-CCC-9

Exhibit CT1/S4/p. 12 and Exhibit D/T8/S2

The evidence states that Enbridge Gas looked to the SAG regarding whether or not there were any gaps in the DSM program proposals and/or whether there were other DSM program concepts or ideas that should be explore and considered by Enbridge Gas. The SAG concluded that the proposals are largely consistent with best practice sand there are no material omissions. In light of this why is Enbridge Gas proposing an annual \$3 million plus budget for research, development and market data?

C-CCC-10

Exhibit C/T1/S6

Please provide a list of all eDSM/CDM programs expected to be provided by the IESO for the period 2027-2030. To what extent will Enbridge Gas participate in any eDSM programs delivered by individual electricity distributors? Where would the funding come from in these cases?

C-CCC-11

Exhibit C/T1/S6/p. 3

Please provide all contracts and agreements between the IESO and Enbridge Gas regarding the Home Renovation Savings Program. What is the overall annual cost of the program for each year 2027-2030 and how are those costs allocated between the IESO and Enbridge Gas?

C-CCC-12

Exhibit C/T1/S6/p. 11

Enbridge Gas in conjunction with the IESO is currently working on a proposal to Natural Resources Canada to deliver the Canada Greener Homes Affordability Program (CGHAP). CGHAP will provide low-to-median income homeowners and tenants with no-cost home retrofits. It is anticipated that the program will be launched in 2026. While the details of the proposal and subsequent agreement are still to be determined, Enbridge Gas will endeavour to have CGHAP programming complimentary to the proposed 2027-2030 Plan offerings:

- a) How does this program relate to the Whole Home Offering?
- b) When are the program details expected to be finalized?
- c) What is the expected cost of the program? Please explain how the funding will work between NRCAN, Enbridge Gas and the IESO.
- d) How will this program fit into Enbridge Gas's current proposed DSM Plan;
- e) How will this program impact Enbridge Gas's current DSM FTEs and overall DSM budget?

D-CCC-13

Exhibit D/T1/S1/p. 1

Preamble:

The evidence states that the 2027-2030 DSM plan reflects Enbridge Gas's commitment to continuous improvement in DSM programming. CCC is interested in seeing DSM costs and savings for the last 10 years relative to the proposed 2027-2030 Plan:

- a) Please provide a schedule setting out all DSM costs (including program costs by program, administration costs, other costs, low-income costs and SSM amounts). Please provide actuals for the period 2015-2025 and projected costs for the period 2026-2030;
- b) Please provide projected savings by program and actual savings achieved for the period 2015-2025. Please provide projected savings for the period 2026-2030;
- c) Please provide the total DSM costs that have been funded through residential rates for the period 2015-2025. Please provide the forecast costs for the period 2026-2030. (Please use the same format as was provided in Exhibit JT1.7 – EB-2024-0198)

D-CCC-14

Exhibit D/T1/S1/p. 6

Enbridge Gas is committed to ensuring that all eligible residents and businesses across its service area can access, participate in, and benefit from DSM programs. CCC is interested in how many customers have participated in the full home audit programs.

- a) For the years 2015-2026 please provide forecast and actual participant for the residential programs. Please differentiate between participants in the full home audit programs and those that were given one measure.
- b) For the years 2027-2030 please provide the projected participant levels in the same format.

D-CCC-15

Exhibit D/T2/S1/p. 6 Tables 1-4

Enbridge Gas has set out its proposed gas savings targets for all of its programs:

- a) Please explain, in detail, how these targets were developed?
- b) How can the OEB and intervenors assess the reasonableness of these targets?
- c) Were any external consultants used to develop the targets aside from the Apex Analytics study referred to? If so, please file any reports prepared by those consultants;
- d) Are the targets at 100% considered achievable or stretch targets? Please explain.

D-CCC-16

Exhibit D/T2/S1/p. 11

Changes to input assumptions and adjustment factors are proposed in cases where input assumptions for prescriptive measures are revised through changes to the Technical Resource Manual. Please explain how changes are made to the TRM? Who oversees the process? In the past how many input assumption changes were made on an annual basis? In effect, what is the likelihood that targets will be adjusted during the plan term?

D-CCC-17

Exhibit D/T2/S2/p. 5

In developing its overall DSM budget Enbridge Gas points to the first Guiding Principle in the OEB's DSM Framework – the need to balance natural gas savings with customer bill impacts. Please explain how Enbridge Gas assessed what would be reasonable bill impacts consistent with affordability.

D-CCC-18

Exhibit D/T2/S2 -Table 1

For each year 2027-2030 please indicate how much of the income qualified amounts (\$27.336m, \$29.790m, \$32.880m and \$35.657m) are allocated to the residential rate classes. For each year please indicated how much of the Portfolio Subtotal costs (\$17.638m, \$17.738m, \$18.043m and \$18.353m) are allocated to the residential rate classes. Does this include all costs for which Enbridge Gas is seeking recovery for through this Application? If not, please explain.

D-CCC-19
Exhibit D/T2/S3/p. 5

Enbridge Gas is proposing several changes to its DSM shareholder incentive. These are based on changes proposed by the SAG. The maximum available incentive available in 2023 was \$20.9 million, increasing in subsequent years by the annual rate of inflation. Enbridge Gas is proposing that the shareholder incentive amount available at 100% scorecard performance should be 5% of Enbridge gas's total annual DSM budget. For 2027 this would be \$19.1 million achievement of targets above 100% to 130% Enbridge Gas would have 100%-200% of available annual shareholder incentive. Please provide the maximum DSM SI amount available to Enbridge Gas in each year under this proposal.

D-CCC-20
Exhibit D/T2/S3

For each year 2015-2025 please provide the actual DSM SI amounts Enbridge Gas has received.

D-CCC-21
Exhibit D/T2/S3/p. 14

Enbridge Gas is not proposing to continue with the End-of-Term Natural Gas Reduction Incentive (EOTNGRI). This was discussed with the SAG. The SAG agreed that DSM is not the only Enbridge Gas activity that affects the magnitude of gas sales. Did the SAG and Enbridge Gas consider any other long-term incentives to replace the EOTNGRI? If so, please discuss. If not, why not?

D-CCC-22
Exhibit D/T3/S1/p. 2

Please confirm that the overall residential program portfolio has a TRC-plus ratio of less than 1. Please confirm that the TRC-Plus ratio for the Whole Home Program in 2027 is .58. Please confirm that the TRC-Plus ratio for the Energy Education & Outreach Program Level Costs in 2027 is .39:

- a) Why is it appropriate for Enbridge Gas residential customers to continue to fund programs that are not cost-effective?

- b) At what point in terms of cost-effectiveness would Enbridge Gas not deliver the Whole Home Program?
- c) Please confirm that the costs of this program outweigh the benefits;
- d) In its residential survey did Enbridge Gas seek input regarding the willingness of residential customers to pay for a program that is not cost-effective? If not, why not?

D-CCC-23
Exhibit D/T3/S1/p. 2

Please provide the number of customers that have participated in a home audit/retrofit type program in both franchise areas (Union and Enbridge Gas) in each year since 2015.

D-CCC-24
Exhibit D/T3/S1/p. 2

Have Enbridge Gas and the IESO discussed the possibility that the OEB will not continue to approve the Whole Home Program? If so, is that possibility covered by contractual conditions? If so, what are those contractual conditions? If not, why not? What are the implications for both Enbridge Gas and the IESO if the OEB chooses not to approve the program as currently structured?

D-CCC-25
Exhibit D/T3/S1/p. 6

The evidence state that measures such as electric heat pumps within the Heat Pump Offering contribute to the Residential Program TRC-Plus ratio below 1. In light of this why is Enbridge Gas continuing to offer electric heat pumps to its customers as part of the DSM portfolio of programs?

D-CCC-26
Exhibit D/T4/S1/p. 2

Enbridge Gas has 21 FTEs allocated to the Residential DSM Program. What is the annual cost of those FTES?

D-CCC-27
Exhibit D/T4/S1/p. 6

Enbridge Gas is seeking recovery of an annual Research, Development & Market Data budget of approximately \$3 million in each year. Please indicate how those costs are to be allocated amongst the rate classes.

D-CCC-28
Exhibit D/T8/S3/p. 7

Enbridge is proposing an Energy Innovation Fund as part of its 2027-2030 DSM plan. An annual budget starting at \$2 million in 2027 is proposed for the commercial and industrial sectors. Please confirm that these costs will not be funded through residential rates. If not, please explain why not.

D-CCC-29
Exhibit D/T9/S2

What is the assumed free-ridership rates for the residential Whole Home Program? When was this developed? When does Enbridge Gas and the OEB intend to do an updated study regarding this free-ridership rate? Are residential program participants surveyed with respect to free-ridership? If so, please provide the most current results? If not, why not?

E-CCC-30
Exhibit E/Tab 2/S1/p. 24

The evidence states that the forecasted natural gas savings used in the proposed Heat Pump Offering targets reflect current assumption and modelling inputs available at the time this Application was developed. Given current energy prices the consumer economics of fuel switching to CCASHPs for space heating are likely to be negative. Actual results may vary based on:

- a) The number and types of ccASHP projects consumers undertake;
- b) Geographic location
- c) Heat pump sizing; and
- d) The outdoor switch-over temperature selected by the participant.

In light of these factors how does Enbridge Gas intend to measure actual savings for ccASHPs? Why are cASHHPs still part of the Enbridge Gas offering?

E-CCC-31
Exhibit E/T2/S2/p. 7

Please describe in detail how Enbridge Gas evaluates the Whole Home Offering. Has Enbridge Gas ever considered doing pre and post measurements of natural gas usage for program participants? If so, please provide the results as compared with the existing methods for measuring savings? If not, why not? Would it not make sense to look at actual savings versus implied savings?

E-CCC-32

Exhibit E/T2/S4/p. 3

With respect to the Heat Pump Offering the evidence states that Enbridge Gas may introduce additional measures in the future based on TRM approved measures. Please indicate what specific measures Enbridge may consider.

E-CCC-33

Exhibit E/T2/S7/p. 4

Please provide a full explanation as to how the Energy Education and Outreach Offering will be evaluated and savings measured.

F-CCC-34

Exhibit F/T2/S1/p. 1

Please provide a complete explanation as to how the Demand Side Variance Account operates. With respect to the Residential Programs how much could the costs increase in any given year through the DSMVA for each year 2027-2030?