

Elson Advocacy

May 26, 2026

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ritchie Murray:

Re: EB-2025-0295 2027-2030 Enbridge Gas Inc. Demand Side Management Plan (“DSM”)

I am writing on behalf of the Small Business Utility Alliance (“SBUA”) in response to Enbridge’s correspondence dated May 19, 2026.

SBUA respectfully submits that the Board should reject Enbridge’s request to limit the proposed evidence of the Green Energy Economics Group (“GEEG”) to issues “not dealt with by the [Stakeholder Advisory Group] (“SAG”).”

Enbridge Request Unreasonable and Unnecessary

Enbridge’s request misconstrues the purpose and context of the 2023-24 DSM SAG process. As OEB Staff stated in their letter of today’s date, the SAG was convened to provide input and recommendations from relevant individual experts for Enbridge to consider in developing its DSM plan. SAG members were not responding to a specific proposed DSM plan or reviewing actual anticipated costing, savings or other finalized forecasts. As a result, their feedback was general in nature and somewhat limited, as noted in their final report:

Non-utility members agreed that in order to provide the level of feedback that would be useful to Enbridge, they would require detailed information, which could not be provided in the limited amount of time available following the completion of the APS and Enbridge needing to file its DSM plan.¹

...

Non-utility members indicated that time did not permit Enbridge to provide a detailed analysis of how its program budgets and savings were developed which will be necessary to review when reviewing the final program proposals.²

¹ EB-2025-0295, Exhibit C, Tab 1, Schedule 4, Attachment 1, p. 21.

² EB-2025-0295, Exhibit C, Tab 1, Schedule 4, Attachment 1, p. 39.

Now that a full application has been filed with the OEB, including all relevant forecasts, it is appropriate and helpful for the Board to receive expert evidence on the specific details of that plan. As OEB Staff noted in their comments on the SAG process, the group’s final report cannot and should not be interpreted as an endorsement of Enbridge’s ultimate DSM plan. Instead, “[t]he proposals put forward by Enbridge Gas will be adjudicated based on the evidence filed in the application.”³ In other words, the existence of the SAG did not displace the need for a full hearing on the merits of Enbridge’s DSM application. It merely helped identify some areas of consensus from which Enbridge should build its DSM proposal.

Moreover, as the final report makes clear, there were many areas of sustained disagreement within the SAG, upon which consensus was not reached. These are not necessarily minor or irrelevant issues to the Board’s consideration. Yet, under Enbridge’s proposed approach to expert evidence, if an issue was not the topic of a final consensus recommendation or not voluntarily reviewed by Enbridge in its application, it cannot now be addressed. In addition, Enbridge’s request is too cumbersome and time consuming. The Board will be forced to review the minutes from 38 separate meetings in order to try and decipher what if any feedback may have been received from individual SAG members on those topics in order to adjudicate disputes over what matters have been “addressed” by the SAG. This is inefficient and unnecessary.

Enbridge has stated that “[a]s is the case with the SAG Report overall, it is not practical to try and summarize here each and every comment and recommendation that was raised and Enbridge Gas’s response.”⁴ While this may be true, in concert with their request to limit GEEG’s evidence to issues not considered by the SAG, important evidence on the viability and effectiveness of certain aspects of the proposed plan would likely be omitted from the record and the Board’s analysis. Given the introduction of specific small and micro business incentives to the 2027-30 DSM plan, it is particularly important that the OEB receive all relevant evidence regarding these proposed programs. If SBUA is permitted to provide evidence from GEEG, it will do so in the most helpful and efficient manner possible, in keeping with the goals of the DSM proceeding.

Finally, SBUA notes that it represents a constituency, which extends beyond potential participants in the proposed micro-business offering. That program, estimated at a cost of \$1.4M, is restricted to businesses operating out of previously residential buildings. This represents a fraction of the 407,428 small employer businesses operating across Ontario.⁵ As such, while the proposed expert evidence of GEEG will likely address Enbridge’s proposed micro business offering, it will also touch on broader issues related to the other business offerings that affect small and micro business participation and savings.

Yours truly,



Kate Rose Siemiatycki

³ EB-2025-0295, Exhibit C, Tab 1, Schedule 4, Attachment 1, p. 8.

⁴ EB-2025-0295, Exhibit C, Tab 1, Schedule 4, p. 9.

⁵ Government of Canada, 2024 Key Business Statistics [[Link](#)]. 98% of all employer businesses in Ontario are small businesses (1-99 employees).