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Mr. Ritchie Murray
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June 29, 2026

EB-2025-0295 – Enbridge 2027-2030 DSM Application
Pollution Probe Comments on Enbridge Confidentiality Request

Dear Mr. Murray:

Pollution Probe is in receipt of the Enbridge Gas (Enbridge) request for confidential treatment filed June 18, 2026, including a list of proposed redactions pertaining to confidential treatment and redactions on a basis of non-relevance.

Enbridge filed a redacted copy of the IESO-Enbridge Home Residential Savings (HRS) Program Partnership Agreement with redactions the same as those approved by the OEB in EB-2024-0198. Pollution Probe filed a Declaration and Undertaking on June 19, 2026 and in accordance with OEB requirements, Enbridge provided a fully unredacted version of that document on June 22, 2026. In the same confidential correspondence on June 22, 2026, Enbridge refused to provide an unreacted version of Exhibit I.C-STAFF-16 Attachment 2. Following this refusal, the OEB published Procedural Order No. 4 on June 23, 2025 indicating that the redacted information on which non-relevance is claimed would be withheld until the OEB makes a determination following stakeholder submissions. If the OEB decides to approve any redactions in this proceeding to the IESO-Enbridge Residential Partnership Agreement, parties with questions and/or issue with the redacted details in this document can follow the OEB's confidential processes available to deal with those redacted materials. The same procedural option is not currently available for Exhibit I.C-STAFF-16 Attachment 2.

Pollution Probe concurs with all recommendations made by OEB Staff[1]. It is always helpful when parties file submissions in advance of the deadline and OEB Staff filing its letter early was very helpful to avoid duplicating the details outlined in their submission. Of specific importance is the submissions pertaining to information claimed by the applicant as non-relevant.

I.C-STAFF-16, Attachment 2 relates to the allocation of 2025 costs under the one-window Residential HRS Program (which represents the largest single DSM program funded by natural gas ratepayers). The information in Attachment 2 is the first time program cost allocation information has been filed to provide transparency in how the allocation of costs is actually being done compared to the multi-year budgets included in the agreement. Attachment 2 includes program costs, including total program amounts and cost-sharing of administration, promotion and delivery costs allocated to gas and electric ratepayers. One-window program delivery has been a focus for the Province and OEB for many years

[1] OEB Staff Sub_EGI Confidentiality Requests_24062026.

and is expected to deliver greater DSM results at a lower cost. The fair sharing of ratepayer costs, program efficiency (including total costs and allocation) and avoidance of cross-subsidization are key considerations for such a program. Among other references, Section 3.1c of the HRS Partnership Agreement highlights the importance of cost allocation and comparing actual costs to those included in the Agreement budget estimates[2]:

> *At least once each quarter, the members of the Joint Management and Operational Committee will review the current Shared Expenses Forecast to assess whether any written amendments to the forecast or allocation of Shared Expenses is required (A) to account for changes in the scope or nature of Shared Expenses, including the addition or termination of a Program Stream, or (B) to avoid a Cross-subsidy. The members of the Joint Management and Operational Committee will work together in good faith using Commercially Reasonable Efforts to amend the Shared Expenses Forecast as needed, including by adjusting the sharing of expenses that the Joint Management and Operational Committee mutually agrees has resulted in, or will result in, a Cross-subsidy.*

Pollution Probe suggests that the information in I.C-STAFF-16, Attachment 2 is relevant to this proceeding, since it directly relates to how the total HRS Program costs are actually being allocated for the HRS Program. Reviewing current expected costs (compared to past allocation in the Agreement budget estimated over the program term) are a primary input to the TRC Plus Test and will have a direct impact on party positions and OEB considerations in this proceeding. Enbridge did not refuse to answer the very relevant OEB Staff questions in which Exhibit I.C-STAFF-16c and the accompanying Attachment 2 was provided, but it has refused to provide that information in an unredacted format to those that have requested it. Not having access to the unredacted information in Attachment 2 will leave a hole in the record for the largest program in Enbridge's DSM portfolio. Pollution Probe supports providing the unredacted information on the public records on the basis outlined by OEB Staff. If the OEB does not support the OEB Staff recommendations, the information should, at the very least, be provided as confidential information, so that it can be considered during the proceeding, as appropriate.

Respectfully submitted on behalf of Pollution Probe.

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Cc: All Parties (via email)
Richard Carlson, Pollution Probe (via email)

[2] Exhibit I.C-STAFF-16, Attachment 1, Page 76 of 137