



November 3, 2024

Gabriel Weekes  
Ministry of Energy, Conservation and Renewable Energy Division  
77 Grenville Street, 5th floor  
Toronto, Ontario M7A 2C1

Dear Mr. Weekes:

**Re: 2025–2036 Electricity Energy Efficiency Framework (ERO no. 019-9235)**

Enova Power Corp. (Enova), a local distribution company (LDC) is the trusted energy provider, dedicated to delivering safe and reliable energy solutions that power our communities forward. Serving more than 164,000 residential and business customers in the City of Kitchener, City of Waterloo, Township of Woolwich, Township of Wilmot, and Township of Wellesley, our vision is to drive what's next in energy and sustainability for our communities and beyond.

Enova is pleased by the government's 2025-2036 Electricity Framework proposal, specifically LDC Support of Province-Wide Programs, LDC local programs and a long-term commitment to Energy Efficiency EE that will not only make electricity more affordable to customers but could also defer and/or reduce the need to build distribution, transmission and generation infrastructure.

LDC's, including Enova, have proven track records in delivering cost effective electrical energy efficiency (EE) programs as noted in the Electrical Distributors Association 2022 paper, [The Power of Local Conservation](#), to a range of customers including residential, agricultural, small business, commercial, institutional and industrial. We have well-established, cost-effective marketing and communication channels that can quickly and easily be leveraged to educate and engage customers not only in EE programs but the energy transition.

As a community oriented and customer focused organization, Enova has long-standing relationships with our customers, community organizations and a local network of energy resources and professionals that can amplify the messaging and extend the reach.

Enova knows its customers, community and stakeholders' needs best and is well

positioned to design and deliver local programs that meet local needs as well as those upstream including transmission and generation. Enova is also unique in that we can work with our local natural gas providers, including Kitchener Utilities and Enbridge Gas, to ensure all customers have equal access to province-wide programs and develop local programs to meet local needs.

A long-term approach to EE is welcomed as EE is more than a single purchase or project, but a journey, with multiple phases, especially for commercial, industrial, and institutional customers. Having certainty that funding, programs, and support will be available allows customers to develop and implement large projects to support the energy system and drive economic growth and prosperity. Furthermore, EE is one of the most cost-effective resources to manage the growing energy demands.

Thank you for the opportunity to comment on this proposal. Enova looks forward to continued engagement with the Ministry of Energy and Electrification not only on this proposed Framework, but also the energy transition. If you have any questions, please contact Jeff Quint, Manager, Innovation and Energy Management at [jeff.quint@enovapower.com](mailto:jeff.quint@enovapower.com) or (519) 888-5596.

Sincerely,

A handwritten signature in black ink that reads "DMoryc".

Dorothy Moryc, P. Eng., MBA  
VP of Grid Transformation & Chief Distribution Officer