

Mr. Ritchie Murray
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October 27, 2025

**EB-2025-0124 – Review Motion of IRP Pilot Project Decision
Pollution Probe Submission on OEB Preliminary Questions**

Dear Mr. Murray:

Procedural Order No. 1 for the above-noted proceeding invited submissions from parties on the following preliminary question:

Is there still merit in proceeding with the Review and addressing the three questions posed in the Review notice?

The Ontario Energy Board (OEB) also invited parties to address in their submissions whether proceeding with the Review to determine the three Review questions is likely to result in the most just, expeditious, and efficient determination of matters before the OEB. The three questions posed in the Review Notice are as follows:

1. By requiring the use of electricity-based IRPAs and/or excluding funding for gas-fired technologies, did the Decision alter the IRP Framework improperly, without notice to parties or providing them a full opportunity to address the issue during the hearing?
2. Was there sufficient evidence to support the categorical exclusion of funding for gas-fired technologies in the IRP Pilot?
3. In assessing the cost-effectiveness of electric heat pumps versus gas-fired heat pumps—which formed part of the rationale for denying gas-fired heat pump funding—was there sufficient evidence of, and did the Decision adequately consider, the potential cost of any required electricity system upgrades?

It is not clear what prompted the OEB to initiate the Review Motion based on the questions above, given that the proceeding included a robust process and evidentiary basis on which the Decision was based. The fact that a Review Motion was initiated puts in question the IRP Pilot Decision¹ and impacts a portion of a long-awaited pilot project that was intended to be completed prior to the end of 2022. The Pilot Project by its very nature was intended to assist in

¹ EB-2022-0335 Decision.

understanding and evaluating how IRP can be implemented to avoid, delay or reduce facility projects. The implementation of an IRP pilot was meant to be a learning opportunity parallel to normal IRP implementation and was not meant to impact current IRP requirements or expected results for Enbridge’s Capital portfolio. The structure and approach of the IRP Pilot Project approved by the OEB is discretely separate from the current day-to-day IRP requirements, as intended. Somehow, the IRP Pilot Project has become more than it was intended to be and appears to have become intertwined with the current IRP Framework, OEB requirements and perhaps the pending IRP Framework evaluation and review occurring as part of the recently launched EB-2025-0125 proceeding. All of which could further delay implementation of this overdue pilot project. Further delays would certainly not resulting in the most just, expeditious, and efficient approach for the IRP Pilot Project.

Successive delays in effective IRP implementation have resulted in no actual IRP results since the IRP Decision and Framework was established in 2021². Additionally, the two IRP pilot projects ordered by the OEB remain outstanding, although one of these has commenced. A delay in resolving the issues outlined in the Review Motion compounds the four years of pilot project delays already experienced. It appears most expedient to resolve the Review Motion by either proceeding with it in an expedited manner or if the basis for the Review Motion is no longer valid, it could be withdrawn. The situation that the Review Motion has created is that the IRP Pilot Project approved via EB-2022-0335 has in fact been truncated (i.e. a portion of the IRP Pilot and related budget is stranded). The longer that this situation persists, the lower the likelihood and practicality³ exist to proceed with the stranded portion of the IRP Pilot Project. If the OEB intends to delay assessing the issues outlined in the Review Motion, it is more practical, transparent and efficient to simply determine that the IRP Pilot Project is limited to the subset of the OEB Decision that is not in question. The overall options available to the OEB appear to be:

Option	Impact
Option 1: Proceed with a truncated IRP Pilot based on the OEB Decision and with the elements outlined in the Review Motion remaining stranded. This is essentially what exists today with the Review Motion stranded.	This is what Enbridge is actively deploying now. It reduces the scope and scale of the IRP Pilot Project, but a smaller pilot is better than no pilot and extremely better than delaying a decision on the Review Motion.
Option 2: Proceed with Review Motion in an expeditious manner.	This would enable the IRP Pilot Project to proceed using the intended larger scale and scope. It may also provide clarity on the issues outlined in the Review Motion,

² EB-2020-0091 dec_order_EGI_IRP_20210722.

³ A portion of the IRP Pilot Project is being finalized and implemented now. If the remaining portion is not resolved quickly, it will be impractical and inefficient to integrate it with the broader IRP Pilot Project.

Option	Impact
	although given that this is just a pilot, any policy clarifications will have no broader value until it formally becomes part of the IRP Framework.
Option 3: Withdraw the Review Motion	This would enable the full IRP Pilot Project as approved by the OEB to proceed in the most expeditious manner. Given that the OEB Decision relates only to the IRP Pilot Project, it has no broader implications. The OEB is proceeding with a separate review of the IRP Framework and any broader policy issues could be considered within that scope.
Option 4: Delay resolution of the Review Motion and intertwine it with the broader IRP Framework review.	This is the same impact to the Pilot Project as Option 1 given that the elements (impacting scope and budget allocation) outlined in the Review Motion remain stranded. It is less just, expeditious, and efficient than Option 1 given that it will blur the intended separation between a pilot project and the broader implementation of IRP. It will also lead to lingering uncertainty as a portion of the IRP Pilot Project is implemented. Timing of the IRP review and evaluation is not aligned with IRP Pilot Timing and an outcomes would come too late to apply to the IRP Pilot Project.

The OEB invited parties to address in their submissions whether proceeding with the Review Motion now is likely to result in the most just, expeditious, and efficient determination of matters before the OEB. This question presumes that there is a more just, expeditious, and efficient approach available. The table of options above provides some insight into those options. If the Review Motion were to remain stranded and mixed into the review and evaluation proceeding that has recently launched⁴ (Option 4 above), it will essentially be mixing apples (pilots) with oranges (non-pilot requirements). Mixing in Review Motion issues for an isolated pilot project into a broader IRP Framework proceeding does not appear to be a just, expeditious, and efficient approach.

As noted by the OEB, EB-2025-0125 is specifically aimed to assess the efficiency and effectiveness of the Framework’s implementation, evaluate its impact on ratepayers, and

⁴ EB-2025-0125.

identify opportunities to improve how Enbridge Gas plans for system needs. This is discretely different than a Review Motion for an isolated pilot project. The OEB Staff Discussion Paper and Stakeholder Session (held October 22, 2025) related to EB-2025-0125 acknowledged that IRP is not a single siloed set of activities and that it is integrated across the entire Capital planning lifecycle and related proceedings. IRP considerations appropriate relate to a range of regulatory proceedings from gas supply and procurement (including supply side options), annual Asset Management Plan, Rate Case issues (including Capital allocation), Account Clearances (including IRP accounts and related reporting), etc. OEB Staff confirmed that the EB-2025-0125 evaluation and review is not intended to interfere with the ongoing IRP considerations occurring in other parallel proceedings. This principle should also apply to the IRP Pilot Project approved in EB-2022-0335.

Respectfully submitted on behalf of Pollution Probe.



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