

BY EMAIL and RESS

October 27, 2025

Mr. Ritchie Murray
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Mr. Murray:

EB-2025-0124: Motion to Review Integrated Resource Planning (IRP) Pilot Decision in EB-2022-0335 - Building Owners and Managers Association Toronto's (BOMA Toronto) Submissions

Introduction

On March 27, 2025, the Ontario Energy Board (OEB) issued a notice of review on its own motion (the Review) to reconsider the Decision and Order in EB-2022-0335, issued on the same date. In its October 6, 2025 Procedural Order No.1, the OEB invites 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 OEB also invites parties to address, in their submissions, whether proceeding with the Review to determine the three questions (listed below) is likely to result in the most just, expeditious, and efficient determination of matters before the OEB.

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 the parties or providing them a full opportunity to address this 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?

BOMA Toronto Submission

BOMA Toronto does not believe proceeding with the Review will result in the most just, expeditious, and efficient determination of matters before the OEB.

1. Review and Evaluation of the Integrated Resource Planning Framework for Enbridge Gas (EB-2025-0125)

On March 27, 2025, the OEB launched a consultation to support a review and evaluation of its Integrated Resource Planning Framework for Enbridge Gas. After reviewing the OEB Staff Discussion Paper on IRP Framework Review (issued on October 6, 2025), BOMA Toronto believes the three questions outlined in the Review (and among other important issues) will be fully addressed in EB-2025-0125. As such, there is no need to proceed with this Review anymore as it will be a duplicated effort and may potentially cause confusion.

2. Timing is Key

In EB-2022-0335 (Enbridge Gas Integrated Resource Planning Pilot Project Application), there have been project scope changes, application updates and delays, and the approved single IRP pilot is already years behind the original timeline set by the OEB in its July 22, 2021 Decision on EGI's IRP Proposal Application (EB-2020-0091). Proceeding with the Review will create uncertainties and may cause further delays to the already late timeline of Enbridge Gas's IRP pilot.

Ontario cannot wait more to start taking coordinated action on IRP opportunities. Every Enbridge Gas capital infrastructure project should already be subject to a formal review of the current gas demand profile for the section of the gas system involved, and the potential peak demand reductions in related buildings. As such, BOMA Toronto submits that this pilot project should proceed as approved with no further delay, while the three questions outlined in the Review can be appropriately addressed in EB-2025-0125.

Respectfully submitted on behalf of BOMA Toronto,



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