



Ontario  
Energy  
Board | Commission  
de l'énergie  
de l'Ontario

BY EMAIL AND WEB POSTING

November 13, 2025

**To: All Regulated Entities  
All Other Interested Stakeholders**

**Re: Adoption of Amendments to the *Rules of Practice and Procedure* Related to  
the Use of Artificial Intelligence in Filings, Reviews and Other Matters  
Ontario Energy Board File No. EB-2025-0142**

The Ontario Energy Board (OEB) has posted amendments to its [Rules of Practice and Procedure \(Rules\)](#) to address the use of artificial intelligence in preparing filings by parties for adjudicative proceedings. The OEB has also used this occasion to make three further amendments to the Rules relating to the following: reviews on the OEB's own motion; interventions by individuals; and the timing for the filing of documents.

The revisions to the Rules are effective immediately except for the revisions related to the use of artificial intelligence in preparing filings which are effective **December 1, 2025**. All revisions apply in respect of filings made or matters commenced on and after the respective effective dates, as applicable.

### **Amendments to Rules 3, 9 and 23 Regarding the Use of Artificial Intelligence in Preparing Filings**

By [letter](#) dated April 11, 2025, the OEB invited stakeholder comments on proposed amendments to Rules 3 and 9 of the Rules (the April Proposal) regarding the use of artificial intelligence in preparing filings, which are intended to ensure that information filed in OEB proceedings is verified for accuracy whenever it is generated using artificial intelligence.

The OEB received written comments from six stakeholders representing regulated companies and other interests, which are all available on the [OEB's website](#).

The OEB has made changes to the Rules relative to the April Proposal in response to that stakeholder feedback as described below. This letter also responds to some additional issues raised by stakeholders in their written comments.

### *Definition of Artificial Intelligence*

Most stakeholders suggested improvements to the proposed definition of “artificial intelligence system” to more clearly focus on generative artificial intelligence and ensure that artificial intelligence systems that do not create new content are not captured. The OEB has revised the definition accordingly, including by using “generative artificial intelligence” as the defined term.

### *When Disclosure is Required and Where it Should be Made*

Stakeholder comments also focused on the breadth of the requirement to make a disclosure in relation to artificial intelligence that is used “in preparation of a document” as well as on how disclosure is to be made.

The OEB acknowledges the practical concerns noted by stakeholders and has revised the disclosure obligation in Rule 9.03 such that it applies only where generative artificial intelligence is used “to generate content in a filing that is prepared for a proceeding”. This clarifies that disclosure is only required in respect of materials prepared for the purposes of a proceeding, and not for materials that may have been prepared for other purposes but included in a filing (such as copies of emails and minutes of Board of Directors meetings).

The OEB has also made provision for greater flexibility on the location of the disclosure for applications and multi-document filings (see new Rule 9.04).

The OEB does not believe that it is necessary, as suggested by one stakeholder, to adopt a standard disclosure statement at this time. For the assistance of parties, the OEB would consider the following to be suitable (adapted as needed for multi-document filings): *Generative artificial intelligence was used to generate content within this filing. [Party name] confirms that such content has been verified for accuracy by [name of party or its representative] without the assistance of generative artificial intelligence.*

### *Application of the Rules to Non-Parties*

One stakeholder suggested that a similar obligation to disclose the use of artificial intelligence should apply to people filing letters of comment, and another stakeholder asked how the new Rules would apply to the OEB. The OEB agrees that a similar disclosure would be useful in respect of letters of comment and has amended Rule 23 accordingly as well as making provision for this disclosure on its [online letter of comment form](#). The OEB expects that where documents have been prepared by or for OEB staff for filing in a proceeding, a disclosure consistent with the Rules will be provided.

### *Other issues*

A number of stakeholders commented that the Rules would introduce unnecessary administrative burden given that applicants are already required to attest to the accuracy of some of their filings. While these other requirements exist, they do not

cover all filings by applicants, nor do they cover filings by other parties. The OEB is mindful of avoiding administrative burden but believes that the Rules are needed for transparency and to support the integrity of the adjudicative process, consistent with what adjudicative bodies have done in response to the use of artificial intelligence in their proceedings. With the changes described above, the OEB believes that the Rules strike an appropriate balance between the needs of parties and the needs of the adjudicative process.

One stakeholder suggested that the Rules and the *Practice Direction on Confidential Filings* be amended to address the risk of improper information dissemination through artificial intelligence systems and to implement restrictions on parties receiving confidential information regarding the use of artificial intelligence. The OEB does not believe this change to be necessary as the matter is already addressed by the current form of [Declaration and Undertaking](#). Specifically, inputting confidential information into a public artificial intelligence system would violate the undertaking to “protect Confidential Information from unauthorized access.”

A number of stakeholders suggested that the OEB consider publishing additional guidance regarding the application of the Rules or establishing an advisory panel or technical working group to monitor their effectiveness. While the OEB does not consider that these steps are needed now, the OEB will monitor how the Rules are applied in practice as well as the evolution of generative artificial intelligence more broadly and will consider additional measures as warranted.

## **Other Amendments to the Rules**

### *Amendments to Part VII Regarding Reviews on the OEB’s own Motion*

For transparency and to provide greater clarity to stakeholders, Part VII has been amended to clarify that reviews on the OEB’s own motion are commenced by the Chief Commissioner and that the “test” for cancelling, suspending or varying a decision or order is the same regardless of whether the review is at the instance of the OEB or a third party.

### *Amendments to Rule 22 Regarding Individual Intervenors*

As part of the 10-point Action Plan outlined in its September 2024 [Report Back to the Minister on Intervenors and Regulatory Efficiency](#), the OEB indicated that it intended to implement changes that would screen individuals seeking to intervene in OEB regulatory proceedings against specific criteria. The OEB has now made changes to Rule 22 that establish the screening criteria against which intervention requests by individuals will be considered.

### *Amendments to Rules 3 and 6 Regarding Timing for the Filing of Documents*

The OEB has made revisions to provide greater clarity regarding the time of day by which documents are required to be filed with the OEB by including relevant information

in the Rules themselves rather than referencing information on the OEB's website. These revisions (deletion of the "hours of operation" definition in Rule 3.01 and revisions to Rule 6.01) do not change the current 4:45 pm filing deadline for most business days.

Any questions relating to this letter should be directed to [Registrar@oeb.ca](mailto:Registrar@oeb.ca). The OEB's toll-free number is 1-888-632-6273.

Yours truly,

Damien A. Côté  
Chief Commissioner