

November 19, 2025

Independent Electricity System Operator

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**Via Email and RESS**

Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, ON M4P 1E4

Dear Mr. Ritchie Murray:

**Re: EB-2025-0125: IESO Submission on the Ontario Energy Board's (OEB) Review and Evaluation of the Integrated Resource Planning (IRP) Framework for Enbridge Gas**

The Independent Electricity System Operator (IESO) appreciates the opportunity to provide comments in connection with the OEB's IRP Framework consultation. The IESO's comments focus on the "Electrification as an IRP Alternative" topic identified in the [OEB's letter](#) dated October 5, 2025. Since electrification shifts demand from the gas system to the electricity system, and potentially during peak electricity demand periods, it will be important for planning of these two energy systems to be coordinated, especially at the distribution level.

Recommendations from this review should complement and leverage gas-electric planning coordination initiatives that are underway as part of implementing the government's Integrated Energy Plan (IEP). This includes the OEB's gas-electric coordination forum and the IESO's engagement process for enabling natural gas distributors to participate in electricity planning processes.

The IESO views gas-electric coordination at the distribution level as an essential first step in enabling electrification as an IRP alternative. The most immediate impact of electrification measures of the scale contemplated in the IRP process (approximately a few megawatts in size in any given project or region) will be on the electricity distribution system. Existing transmission system capacity constraints will likely not be exacerbated with electrification of this scale. Any consultation requirements established in the IRP Framework should start with coordination between gas and electricity distributors to assess the electrification's impact on the electricity distribution system. To the extent there are cumulative impacts of various

electrification initiatives that have bearing on existing transmission constraints in the near to medium term, these constraints will be identified by the Technical Working Group through the electricity regional planning process and addressed in a timely manner through regional planning recommendations.

Given the preceding, the IESO notes that it is the only organization participating in the IRP Working Group that has expertise in electricity system planning, though there are others. The IESO recommends expanding the IRP Working Group membership to include representation from the electricity distribution sector given their important role in assessing the impact of electrification on their systems, or alternatively, identify another forum for electricity and gas distributor coordination.

The IESO recognizes the importance of working with the OEB, gas and electricity distributors, and the energy sector to improve the design of the IRP Framework. We look forward to continuing to participate in the consultation process.

Sincerely,



Carrie Alouassis

Senior Manager, Regulatory Affairs