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VIA EMAIL and RESS

November 19, 2025

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

Dear Ritchie Murray:

Re: Enbridge Gas Inc. ("Enbridge Gas" or "the Company")
Ontario Energy Board ("OEB") File No. EB-2025-0125
Integrated Resource Planning ("IRP") Framework Review
Comments on OEB Staff Discussion Paper

Pursuant to the OEB's letter dated October 6, 2025, enclosed please find Enbridge Gas's written comments in response to OEB staff's Discussion Paper in the above-noted proceeding.

If you have any questions, please contact the undersigned.

Sincerely,

Haris Ginis

Haris Ginis
Technical Manager, Regulatory Applications

cc: David Stevens (Aird & Berlis LLP, Enbridge Gas Counsel)
Michael Parkes (OEB Staff)
Participants (EB-2025-0125)

A. BACKGROUND

1. On July 22, 2021, the OEB issued its Decision and Order in respect of Enbridge Gas's Integrated Resource Planning ("IRP") Proposal[1] and issued its first-generation IRP Framework for Enbridge Gas ("IRP Framework") (EB-2020-0091).[2]

2. On March 27, 2025, the OEB launched a consultation to support a review and evaluation of its IRP Framework (EB-2025-0125).[3] On October 6, 2025, OEB staff issued its IRP Framework Review Discussion Paper ("Discussion Paper"), which included OEB's staff's proposed updates to the IRP Framework and nineteen discussion questions to stakeholders. On the same day, the OEB issued a letter inviting stakeholders to submit written comments addressing OEB staff's proposals by November 19, 2025.

3. Enbridge Gas's comments on the Discussion Paper are provided below.

B. OVERVIEW

4. Enbridge Gas supports updates to the IRP Framework that improve alignment of IRP activities with provincial public policy, particularly the Government of Ontario's Integrated Energy Plan ("IEP"),[4] which emphasizes an affordability-first approach that centres on customer choice and recognizes the critical role of natural gas in Ontario's energy mix.[5] Any evolution of the IRP Framework must reflect these principles to ensure that IRP activities remain practical, cost-effective, and policy aligned.

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[1] EB-2020-0091, OEB Decision and Order, July 22, 2021.

[2] EB-2020-0091, OEB IRP Framework for Enbridge Gas (Appendix A of the OEB's Decision and Order) ("IRP Framework"), July 22, 2021.

[3] OEB Letter, March 27, 2025.

[4] Government of Ontario, *Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7* ("Integrated Energy Plan" or the "IEP"), June 2025.

[5] IEP, pp. 12-19 and 92-102.

5. It is critical that the OEB avoid introducing objectives into the IRP Framework that are outside the intended scope of IRP and inconsistent with Government of Ontario policy. Specifically, the IRP Framework should not include:
    - The pursuit of greenhouse gas emissions reductions as an IRP objective;
    - Measures aimed at favouring one energy source over another, such as promoting electrification over natural gas; or,
    - The application of carbon pricing mechanisms, including a social cost of carbon.

6. These objectives are not within the OEB's jurisdiction to impose and would conflict with the Government of Ontario's IEP. Moreover, the IRP Framework should explicitly affirm that natural gas-based technologies are eligible IRP Alternatives ("IRPA"), consistent with the Government of Ontario's commitment to customer choice.

7. It is important to acknowledge that opportunities where IRPAs provide cost-effective solutions to natural gas system constraints are extremely limited. This fact has become more prevalent following the federal government's decision to set the Federal Carbon Charge to zero, which further reduces the relative cost-effectiveness of IRPAs compared to natural gas facilities. Accordingly, updates to the IRP Framework should reflect a value-to-effort ratio, ensuring that the effort and resources devoted to IRP activities are commensurate with the value they deliver. IRP should only be pursued where there is clear evidence of cost-effectiveness and technical viability, avoiding unnecessary expenditures on outcomes that are unlikely to provide value to ratepayers.

8. Enbridge Gas supports OEB staff's proposal for an IRP Implementation Plan process, which would:
    - Provide regulatory certainty for Enbridge Gas, the OEB, and stakeholders regarding the implementation of IRP policies and non-project-specific activities;
    - Establish a dedicated regulatory forum to address IRP policies and non-project-specific activities; and

- Ensure that IRP policies and non-project-specific activities are not in scope in other regulatory proceedings, improving regulatory efficiency.

9. Enbridge Gas does not support including electrification as an eligible IRPA within the IRP Framework. The Government of Ontario's IEP and associated Directives do not identify electrification as an objective for the natural gas sector, nor do they identify the evaluation or implementation of pipe/wire or non-pipe/non-wire alternatives as an initial priority. Rather, the IEP and Directives focus on the foundational and complex steps required to initiate coordinated planning, including information sharing, scenario modeling, and strengthening utility participation in regional and bulk electricity planning.[6]

10. Enbridge Gas supports increasing the minimum cost threshold for IRP activities requiring OEB approval to $10M, aligning with the cost threshold for Leave to Construct applications. This change would reduce regulatory costs, expedite timelines for implementing IRPAs, and ensure that IRP solutions do not face more stringent approval requirements than pipeline projects.

11. Enbridge Gas also supports introducing a $2M minimum cost threshold for mandatory IRP evaluation of growth-related projects,[7] consistent with the OEB's expectations for non-wires solutions for electricity distributors. This threshold also reflects Enbridge Gas's experience, which demonstrates that IRPAs for low-cost growth-related projects have not been cost-effective and often require disproportionate resources relative to their potential benefits. Similarly, Enbridge Gas proposes introducing a $10M minimum cost threshold for mandatory IRP evaluation of pipeline replacement and relocation projects.[8] Based on Enbridge Gas's experience and the limited cost reduction that can be achieved with a pipe

[6] IEP, pp. 122 and 125.
[7] Classified under the "Growth" Asset Class in the Asset Management Plan ("AMP").
[8] Classified under the "Distribution Pipe" Asset Class in the Asset Management Plan ("AMP").

downsize, these projects have very limited technical and economic viability, and a higher threshold better aligns the value-to-effort ratio.

12. Procedurally, any proposed updates to the IRP Framework should be developed by Enbridge Gas and filed for adjudicative review. This approach leverages Enbridge Gas's experience implementing the current IRP Framework and ensures an updated IRP Framework that includes clarity, precision, and operational feasibility while maintaining stakeholder input through a formal regulatory process. However, before Enbridge Gas proceeds with drafting and filing the proposed updates, the OEB should provide guidance and direction to the Company based on the stakeholder submissions received through this consultation process. This step would help clarify the OEB's expectations and priorities for Enbridge Gas's proposed updates.

C. RESPONSES TO OEB STAFF DISCUSSION QUESTIONS

Chapter 4 – Evolving the IRP Framework

OEB Staff Question #1

What implications does the current public policy environment have for an evolved IRP Framework and the OEB's IRP-related expectations of natural gas distributors?

13. Any updates to the IRP Framework and any IRP-related expectations of Enbridge Gas must align with current public policy objectives. The IRP Framework established this principle under the "public policy" IRP Guiding Principle:

> "Public policy – **IRP will be considered in a manner to ensure that it is supportive of and aligned with public policy**, and in particular the OEB's statutory objectives for the natural gas sector **[emphasis added]**."[9]

14. The Government of Ontario's first Integrated Energy Plan ("IEP"), released in June 2025, marks a significant development in provincial energy policy. The IEP

[9] IRP Framework, p. 5.

emphasizes an “affordability first”[10] approach that “centres on the principle of customer choice” and states that “customers are best positioned to decide which energy solutions work for them – based on their needs, preferences, and budgets.”[11] Chapter 5 of the IEP, titled “Important Role of Natural Gas” (also referred to as the Natural Gas Policy Statement),[12] further reinforces that natural gas remains a “critical” and “vital component of Ontario’s energy mix.”[13] The IEP implementation directive issued by the Minister to the OEB requires the OEB to “consider the government’s Natural Gas Policy Statement to ensure the OEB appropriately considers the future role of natural gas in Ontario’s economy” and emphasizes the “need for an economically viable natural gas network – as the province builds a more diverse energy system – to attract industrial investment, to drive economic growth, to maintain customer choice and ensure overall energy system resiliency, reliability and affordability".[14]

15. Any updates to the IRP Framework must remain aligned with the IEP and with Government of Ontario policy. Without clear direction from the OEB in this regard, Enbridge Gas anticipates that some stakeholders may attempt to influence the evolution of the IRP Framework in ways that diverge from provincial policy. For example, some stakeholders may seek to use the process as an opportunity to expand the IRP Framework to limit investment in natural gas infrastructure based on their decarbonization interests, disregarding the IEP’s emphasis on affordability, customer choice, and the important role of natural gas to Ontario’s energy mix. This would be entirely inconsistent with public policy and the IEP.

16. More specifically, any updates to the IRP Framework should not include objectives such as the pursuit of greenhouse gas (“GHG”) emissions reductions, measures aimed at favouring one energy source over another such as promoting electrification

[10] IEP, pp. 12-19.
[11] IEP, p. 14.
[12] IEP, pp. 92-102.
[13] IEP, p. 95.
[14] Minister’s Directive, Order in Council 802/2025, June 11, 2025, Section 9.

over natural gas, or the application of carbon pricing mechanisms including a social cost of carbon. These elements are not and should not be within the scope of IRP. They also fall outside of the OEB's jurisdiction to impose as an economic regulator, whose mandate in relation to natural gas focuses on rational natural gas system expansion, just and reasonable rates, and reliability and quality of natural gas service under the *Ontario Energy Board Act, 1998*. Taking actions that involve directly or indirectly regulating the downstream implications of natural gas use (including associated emissions) or determining what form of energy is preferable in Ontario is to intrude into the policy and planning powers of elected governments (in addition to contradicting express Government of Ontario public policy, as noted above). It would also result in added costs being placed on Ontario ratepayers during an affordability crisis, an outcome that is wholly inconsistent with the IEP's affordability-first focus and the provincial government's clear and repeated opposition against any new carbon tax, fee, charge or levy absent a referendum.[15] The IRP Framework must remain focused on evaluating cost-effective alternatives to infrastructure investment within the bounds of current public policy, not serve as a proxy for advancing objectives that have not been adopted (or that have been rejected) by the Government of Ontario.

17. Enbridge Gas expects that some stakeholders may rely on practices from other jurisdictions to advocate for changes to the IRP Framework that conflict with Ontario's energy policy. For example, jurisdictions such as New York and California (referenced in "Appendix B: Jurisdiction Analysis" of the Discussion Paper) are implementing non-pipe solutions ("NPA") through IRP. However, these jurisdictions operate under fundamentally different public policy environments and include policies such as the decommissioning of natural gas systems, restrictions to natural gas access in buildings, the prioritization of defined decarbonization goals within established timelines, and infrastructure moratoria. These drivers are not present in

[15] *Protecting Against Carbon Taxes Act, 2024*, S.O. 2024, c. 9, Sched. 5; also see IEP, p. 100 ("Ontario's plan to meet growing energy demand while reducing emissions does not and will not include a carbon tax").

Ontario's policy landscape and such policies can result in higher energy costs for consumers. The OEB must ensure that the IRP Framework reflects Ontario's public policy objectives and avoid importing external frameworks that are incompatible with the province's energy policies.

18. The reality is that opportunities where IRPAs offer viable, reliable, and cost-effective solutions to natural gas system constraints are extremely limited and, as noted in the Discussion Paper, the federal government's decision to set the Federal Carbon Charge to zero further reduces the cost-effectiveness of IRPAs.[16] Accordingly, any updates to the IRP Framework should acknowledge this reality and ensure that an appropriate value-to-effort ratio is reflected. The IRP Framework should remain practical and grounded in the principles of affordability, reliability, safety, and customer choice, ensuring that IRPAs are pursued only where they offer demonstrable value and align with current public policy.

Chapter 5 – Framework Review Topic 1: Update and Oversight of the IRP Framework

OEB Staff Question #2

Which of the procedural options, if any, for updating the IRP Framework do you prefer, and why?

19. The most appropriate procedural option for updating the IRP Framework is for Enbridge Gas to draft and file an updated IRP Framework for adjudicative review and approval by the OEB.

20. Since the approval of the initial IRP Framework in 2021, Enbridge Gas has gained extensive experience implementing its requirements. This experience positions Enbridge Gas to develop a proposed update that accurately reflects what is most likely to deliver effective IRP outcomes in practice.

[16] Discussion Paper, p. 29.

21. An updated IRP Framework requires language that is clear and precise so that it can be interpreted consistently in both regulatory and operational contexts. Enbridge Gas is uniquely positioned to ensure that the proposed updates are developed with the clarity and comprehensiveness needed to support an efficient adjudicative review and seamless implementation following OEB approval. However, before Enbridge Gas proceeds with drafting and filing the proposed updates, the OEB should provide guidance and direction to the Company based on the stakeholder submissions received through this consultation process. This step would help clarify the OEB's expectations and priorities for Enbridge Gas's proposed updates.

22. Conversely, if OEB staff were to develop the proposed updates there is significant risk of inefficiencies, including the need for Enbridge Gas to clarify or correct aspects of the proposal to ensure clarity and precision, as well as to ensure alignment with practical and operational realities. It could also result in extended timelines, duplicative efforts, and increased regulatory burden. Such a process would not support an efficient or effective adjudicative outcome. For these reasons, Enbridge Gas submits that it is better positioned to develop a proposed updated IRP Framework.

23. Enbridge Gas does not support the procedural option of the OEB drafting and issuing a non-adjudicated IRP Framework update. In addition to the concerns noted above, if Enbridge Gas does not develop the proposed updates, a non-adjudicated process would limit the opportunity for stakeholder input on key IRP concepts and the ability for parties to respond to each other's positions. While a non-adjudicative approach may appear administratively simpler, it risks creating regulatory inefficiency and operational uncertainty if the resulting IRP Framework lacks the clarity and precision required for effective implementation.

OEB Staff Question #3

Should any updated IRP Framework be specific to Enbridge Gas, or applicable to all rate-regulated gas distributors?

24. Enbridge Gas does not take a specific position on whether an updated IRP Framework should apply exclusively to the Company or extend to all rate-regulated natural gas distributors. However, if an updated IRP Framework is intended to apply more broadly, it is essential that it clearly delineates any differences in applicability, expectations, or requirements between natural gas distributors. This clarity will help ensure consistent interpretation and implementation across natural gas distributors, while recognizing the varying scale, capabilities, and operational contexts of each distributor.

OEB Staff Question #4

Does the level of detail in the current IRP Framework strike an appropriate balance between:
(a) defining the OEB's expectations and providing regulatory certainty on IRP
(b) Allowing for flexibility and evolution in Enbridge's approach to IRP implementation?
a. Would more or less detail be preferable in an updated IRP Framework?

25. It is essential that the IRP Framework strike a balance between providing regulatory clarity and allowing flexibility for Enbridge Gas to evolve its approach to IRP implementation. In general, the current level of detail in the IRP Framework is appropriate.

26. However, Enbridge Gas believes that the IRP Framework would benefit from a clarification or expansion of the "public policy" IRP Guiding Principle[17] to reflect current public policy, which emphasizes an affordability-first approach that centres on customer choice and recognizes the critical role of natural gas in Ontario's energy

[17] IRP Framework, p. 5.

mix.[18] Specifically, the IRP Framework should explicitly affirm that natural gas-based technologies are eligible IRPAs, consistent with the Government of Ontario's commitment to customer choice. This would help prevent instances where stakeholders attempt to use the IRP Framework to advance interests that are misaligned with its intended purpose and with Government of Ontario policy.

27. For example, Enbridge Gas has observed some stakeholders suggesting that the limited number of actionable IRP activities undertaken in recent years reflects a failure of the IRP Framework. These claims are not based on fact but are rather grounded in the singular goal of reducing or phasing out the natural gas system, regardless of whether this goal aligns with the purpose of IRP, public interest, or current public policy.

28. Another example is the OEB's March 27, 2025, Decision and Order for the Southern Lake Huron IRP Pilot Project Application, which stated that "[t]he inclusion of incentives for gas equipment is entirely inconsistent with the purpose of [IRP and DSM]." This statement was used to justify the exclusion of natural gas-based technologies from the pilot and the expansion of the electric technologies budget.[19] This outcome is misaligned with the current IRP Framework which does not preclude natural gas-based technologies as IRPAs, and with the IEP and Government of Ontario policy which emphasize customer choice and reaffirm the critical role of natural gas in Ontario's energy mix.[20] The resulting regulatory inefficiency (evidenced by the fact that the Southern Lake Huron IRP Pilot Project Decision is currently under review on the OEB's own motion)[21] could have been avoided had

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[18] IEP, pp. 12-19 and 92-102.

[19] EB-2022-0335, OEB Decision and Order, March 27, 2025, p. 5.

[20] IEP, pp. 14 and 95.

[21] EB-2025-0124, OEB Notice of Review on the OEB's own Motion, March 27, 2025, p. 3: "By requiring the use of electricity IRPAs and/or excluding funding for gas-fired technologies, did the Decision change the IRP Framework and do so improperly without notice to the parties and without providing parties with a full opportunity to address the issue through the hearing process?"

the IRP Framework explicitly affirmed that natural gas-based technologies are eligible IRPAs.

29. Similarly, as noted in the Discussion Paper, some IRP Technical Working Group ("TWG") members have recommended that the updated IRP Framework include long-term valuation of GHG emissions benefits and consideration of stranded asset risks, citing the climate crisis and the pace of energy transition.[22] Again, these recommendations are grounded in specific stakeholder interests rather than current public policy, and further underscore the need for a more clearly defined "public policy" IRP Guiding Principle to guide consistent and policy-aligned implementation.

OEB Staff Question #5

Do you support the OEB staff proposal for an IRP Implementation Plan? What modifications, if any, to this proposal, and to the annual reporting approach, would you suggest?
(a). How frequently should an IRP Implementation Plan be developed and reviewed? Should the IRP Implementation Plan be reviewed as part of, or separately from, Enbridge Gas's rebasing application?

30. Enbridge Gas supports OEB staff's proposal for the Company to file a forward-looking IRP Implementation Plan, compatible with the updated IRP Framework, to be reviewed through an adjudicative process.[23] This approach would provide regulatory certainty for Enbridge Gas, the OEB and stakeholders regarding how IRP policies will be implemented over the term of the Plan, and would establish a dedicated regulatory forum to address non-project-specific IRP activities and policies. Enbridge Gas submits that, during the term of an approved IRP Implementation Plan, non-project-specific IRP matters should not be in scope in other regulatory proceedings, thereby improving regulatory efficiency.

[22] Discussion Paper, pp. 29-30.
[23] Discussion Paper, p. 39.

31. Enbridge Gas generally agrees with OEB staffs proposed list of policy/guidance documents that could be considered in an IRP Implementation Plan filing.[24] Regarding the DCF+ test specifically, Enbridge Gas believes this could also include:

    - The DCF+ Supplemental Guide which describes the methodology and assumptions to be applied in the DCF+ test, including illustrative examples; and,
    - The approach to evaluating and selecting the optimal alternative(s), based on the results of the DCF+ test.

32. With respect to the approach to valuing stranded asset risk in the context of IRP assessments, the rebasing proceeding is the appropriate forum to consider and debate the details of Enbridge Gas's demand forecasting methodology and stranded asset risk assessment. If determinations on these matters are made during the rebasing proceeding, IRP-related considerations should be limited to how those determinations are reflected within the DCF+ test.

33. Enbridge Gas agrees with the Discussion Paper's recommendation that flexibility should be provided in how the Company frames its IRP Implementation Plan approval requests, given the evolving nature of IRP and to accommodate future learnings and developments.

34. Enbridge Gas recommends that the IRP Implementation Plan be filed and reviewed through a standalone proceeding, separate from the Company's rebasing applications. Combining IRP Implementation Plan matters with rebasing applications risks diluting the focus and efficiency of both processes. Instead, a dedicated IRP Implementation Plan proceeding would enable a more targeted review and facilitate meaningful stakeholder engagement.

35. Enbridge Gas further recommends that IRP Implementation Plans be aligned with the rebasing cycle and filed after a rebasing decision is issued. This sequencing

[24] Discussion Paper, p. 40.

would allow any outcomes from the rebasing process (such as updates to demand forecasting methodologies) to inform the development of the IRP Implementation Plan. Accordingly, a five-year filing cycle and term for IRP Implementation Plans is appropriate and consistent with the typical rebasing schedule.

36. Considering the current timing of the rebasing cycle, Enbridge Gas proposes that the first IRP Implementation Plan filed following the conclusion of the IRP Framework review has a shorter term ending in 2030, given that the next rebasing decision is expected in late 2028. The subsequent IRP Implementation Plan would then be filed in late 2029, with a decision expected in 2030 for an implementation plan term covering 2031 to 2035.

37. Enbridge Gas does not recommend any changes to current annual IRP reporting requirements or the non-adjudicative nature of the IRP Annual Report. Consistent with current practice, the IRP Annual Report supports the clearance of the IRP costs deferral account.

38. To support clarity around the proposed introduction of an IRP Implementation Plan, Enbridge Gas is summarizing its understanding of the distinct purpose and regulatory role of each IRP-related document to ensure clear delineation:

    - IRP Framework**:** A regulatory framework established by the OEB that sets out the guiding principles, expectations, and regulatory requirements for IRP. The IRP Framework provides direction to Enbridge Gas on the components of IRP Implementation Plans, IRP Plans, and IRP Annual Reports.

    - IRP Implementation Plan: A forward-looking, adjudicated plan filed by Enbridge Gas that outlines how the Company will implement the IRP Framework over a defined term. While the IRP Framework sets out IRP policy direction, IRP Implementation Plans operationalize it by detailing how Enbridge Gas will apply IRP policies and methodologies in practice. IRP Implementation Plans provide clarity on non-project-specific matters, such as the DCF+ test methodology, and provide an opportunity for approval of

innovation-related activities. IRP Implementation Plans should be filed separately from rebasing applications but should follow the rebasing cycle, allowing for broader company-wide policies determined within rebasing applications to inform IRP implementation.

- IRP Plan: A project-specific, non-policy, adjudicated application filed by Enbridge Gas when a defined system need has been identified in the AMP and one or more IRPAs is being proposed to address it. IRP Plans seek OEB approval of the cost consequences of implementing IRPAs. The trigger for filing an IRP Plan (cost threshold or otherwise) and its required contents are defined by the IRP Framework.

- IRP Annual Report: A retrospective, informational, non-adjudicated report filed by Enbridge Gas as part of its annual Utility Earnings and Disposition of Deferral and Variance Account application. IRP Annual Reports summarize IRP activities from the previous year (such as updates from ongoing pilot projects), in accordance with the requirements set out in the IRP Framework.

OEB Staff Question #6

How do you see the role of the IRP Working Group evolving under an updated IRP Framework? Do you agree with OEB staff's proposed approach? Why or why not?

39. Enbridge Gas supports OEB staff's proposed approach regarding the role of the TWG continuing as a consultative body. Enbridge Gas agrees that the TWG should not serve as a substitute for regulatory approval of IRP-related policies or proposals, as regulatory clarity and accountability must continue to be achieved through formal adjudicative processes.

40. It is important to recognize that the TWG has been meeting on a regular and sustained basis since early 2022, with 60 meetings held to date. These meetings have required a significant investment of time and resources, primarily focused on the development and implementation of the IRP pilot projects and guidance

regarding DCF+ test methodologies. As IRP activities evolve, Enbridge Gas believes that the scope and frequency of TWG meetings should also evolve to ensure they remain efficient, purposeful, and complementary to formal adjudicative processes.

41. Based on Enbridge Gas's experience, TWG consultation has proven to be ineffective and inefficient when focused on high-level IRP policy matters where consensus is unlikely to be achieved. Instead, consultation can be effective when focused on specific programmatic or implementation elements. This targeted approach enables a rightsizing of TWG meetings and consultative efforts for each IRP Implementation Plan term, aligned with the planning and execution of specific pilot or non-pilot IRP activities.

42. Enbridge Gas supports OEB staff's proposal of consulting with the IRP TWG on the development of IRP Implementation Plans, recognizing that such engagement should not duplicate prior consultations to date (for example, extensive consultation has already occurred on the DCF+ test and Enbridge Gas has incorporated modifications where appropriate). Enbridge Gas recommends that consultation on the development of IRP Implementation Plans be the only responsibility of the TWG explicitly defined in the IRP Framework, and that the timing and frequency of TWG meetings be determined by Enbridge Gas. Accordingly, the TWG's terms of reference should be updated to reflect this focused mandate.

43. Given the TWG's proposed role in supporting the development of IRP Implementation Plans, Enbridge Gas recommends removing the current requirement for the TWG to review the IRP Annual Report and the associated TWG Report. These reports are retrospective in nature whereas the TWG's focus, as outlined above, should be on forward-looking IRP activities. Aligning the TWG's responsibility with this focus will help ensure its contributions are targeted, efficient, and relevant to the ongoing evolution of IRP planning.

44. During the term of an approved IRP Implementation Plan, Enbridge Gas may determine that additional consultation with interested parties would be beneficial. These Enbridge Gas-led sessions could provide updates on specific pilot and non-pilot projects and solicit stakeholder feedback to support continuous improvement. Where appropriate, a smaller subset of stakeholders may be convened to provide more detailed input to help optimize development for project-specific system constraints. However, such consultation should not be mandated and should be pursued only where it enhances proposals or execution and represents a prudent use of ratepayer costs.

Chapter 6 – Framework Review Topic 2: Innovation

OEB Staff Question #7

Do you support the definition of "innovation-related IRP proposals" as proposed by OEB staff? Why or why not?
(a). Are there additional elements or considerations you believe should be emphasized or included to better define the scope of innovation-related IRP proposals?

45. Enbridge Gas supports OEB staff's proposed definition of innovation-related IRP proposals.

46. Additionally, consistent with the response to OEB Staff Question # 4, the IRP Framework should explicitly affirm that innovation-related IRP proposals can include natural gas-based technologies as eligible IRPAs. This ensures alignment with current public policy which emphasizes an affordability-first approach that centres on customer choice and recognizes the critical role of natural gas in Ontario's energy mix.[25]

[25] IEP, pp. 12-19 and 92-102.

OEB Staff Question #8

Which, if any, of the four proposed oversight mechanisms for innovation-related proposals do you support and why?
a. What modifications to the proposed oversight mechanisms, if any, would you suggest?

47. Enbridge Gas supports the third option of OEB staff's proposed oversight mechanism for innovation-related IRP proposals. Under this approach, IRP Implementation Plans would serve as the forum to outline details of innovation-related proposals that Enbridge Gas plans to pursue, including any associated funding and approval requests. This approach allows for broader stakeholder input through the adjudicative process of the IRP Implementation Plan and provides greater certainty regarding subsequent cost recovery. It also reflects a more streamlined and simplified approach compared to the approach taken with the recent Southern Lake Huron IRP Pilot Project application, which relied on the structure and requirements of an IRP Plan.

48. Enbridge Gas would consult with the TWG on its IRP Implementation Plan prior to filing, including the consideration of innovation-related proposals. Consistent with other aspects of the IRP Implementation Plan where TWG input has been sought, Enbridge Gas would document its consideration of TWG feedback within the IRP Implementation Plan.

49. Enbridge Gas may also choose to consult with stakeholders to solicit feedback to support the continuous improvement of approved innovation-related proposals during the term of an IRP Implementation Plan, however this should only be pursued when it adds value and should not be mandated.

OEB Staff Question #9

What assessment criteria would best support value-driven innovation? Do you agree with the five considerations proposed by OEB staff? If not, what changes would you propose?

50. Enbridge Gas supports the establishment of clear, fit-for-purpose considerations for evaluating innovation-related proposals and generally agrees with the five considerations proposed by OEB staff. Enbridge agrees that these considerations should be applied proportionally, based on the size and cost of the innovation-related proposals, with the level of detail and scrutiny tailored to the scale of the initiatives.

51. Enbridge Gas's comments on OEB staff's five proposed considerations are outlined below. In general, Enbridge Gas submits that these considerations should be interpreted as guidelines rather than requirements.

52. Potential to Address System Needs: Enbridge Gas agrees that innovation-related proposals should be assessed based on their potential to address future system needs.

53. Risk and Oversight: Innovation-related proposals are intended to support learnings from new concepts, which by nature involve a degree of uncertainty. Rather than viewing uncertainty as a negative attribute, proposals should aim to understand and assess the associated risks and uncertainties. This approach enables informed decision-making and supports broader deployment over time. Accordingly, the presence of uncertainty should be evaluated in the context of the full proposal, recognizing its role in advancing innovation and informing future IRP activities.

54. Evaluation and Scalability: Enbridge Gas agrees that it is important to consider how outcomes of innovation-related proposals will be evaluated and how they could transition to broader deployment in the future. However, depending on the nature of

the proposal and the maturity of the underlying alternative(s), it may be challenging to define broader deployment plans at the proposal stage.

55. Alternative Funding: Enbridge Gas recommends expanding this consideration as follows (proposed amendments in *italics*), as support for innovation-related proposals may also take the form of in-kind contributions and/or collaboration that is not direct funding:

> "Alternative Funding *and Collaboration*: Explore opportunities for alternative funding sources to reduce reliance on ratepayers (e.g., government programs, contribution from private sector technology partners) *and/or collaboration/coordination with third-parties to enhance the initiative*."'

56. Knowledge Sharing: The IRP Annual Report provides an appropriate venue for informational updates on the innovation-related activities.

57. Enbridge Gas agrees with OEB staff's proposal that no specific innovation-related proposals should be mandated under the IRP Framework, and that it should remain Enbridge Gas's discretion to bring forward proposals through the IRP Implementation Plan for adjudication.

58. Additionally, the IRP Framework should allow for flexibility regarding the cost-effectiveness and technical viability of innovation-related proposals. More specifically, proposals should not be required to be the most cost-effective or technically viable option to meet a system need, since the innovation-related IRP proposals are primarily intended to support learning which may include assessing and better understanding the economics and technical potential of an alternative.

Chapter 7 – Framework Review Topic 3: Electrification as an IRP Alternative

OEB Staff Question #10

Are you in favour of expanding electrification as an eligible IRP Alternative beyond the current pilots? Why or why not?

59. It is important to recognize that the IRP Framework applies to Enbridge Gas and not to electric LDCs or the IESO. Furthermore, Enbridge Gas has no direct knowledge or oversight of the electricity system and, therefore, cannot assess the financial or reliability impacts of electrification in a given area. As a result, Enbridge Gas submits that the OEB cannot include electrification as an eligible IRPA within the IRP Framework.

60. Although Enbridge Gas is testing electrification as an IRPA within its current IRP pilots, the scale and scope of these efforts are extremely limited. Specifically, the number of participants proposed for electrification measures was 30 for the Southern Lake Huron IRP Pilot Project and approximately 20 for the System Pruning Pilot. Due to the limited scale of these pilots, there is minimal impact to the electric LDCs in the affected areas. Furthermore, these pilots were not designed with the objective of being cost-effective compared to a facility project.

61. Projects in Enbridge Gas's AMP for which IRP assessments are conducted are significantly larger in size and scope than what is being targeted under the current pilots. As noted in the Southern Lake Huron IRP Pilot Project application, broader implementation of electrification measures would require comprehensive integrated energy planning with electricity system providers,[26] including the establishment of common and aligned cost-effectiveness assumptions and a consistent cost-effectiveness methodology. If such a methodology were to be developed, it should build upon the IRP DCF+ test and the extensive consultation and work already undertaken to refine it. Addressing these issues extends well beyond the scope of the OEB's IRP Framework and beyond Enbridge Gas's capabilities as a natural gas distributor.

62. It is also important to note that the Government of Ontario's IEP and associated Directives do not identify electrification as an objective for the natural gas sector, nor do they identify the evaluation or implementation of pipe/wire or non-pipe/non-wire

[26] EB-2022-0335, Exhibit D, Tab 1, Schedule 2, p.1-2

alternatives as an initial priority. Rather, the IEP and Directives focus on the foundational and complex steps required to initiate coordinated planning, including information sharing, scenario modeling, and strengthening utility participation in regional and bulk electricity planning.[27]

OEB Staff Question #11

Is there value in a pilot that includes electrification as an alternative to new customer connections (which is not part of the existing Southern Lake Huron pilot or the system pruning pilot)?

63. Enbridge Gas submits that a pilot that includes electrification as an alternative to new customer connections is not an appropriate use of natural gas ratepayer funds. Consistent with the responses to OEB Staff Questions #10 and #13, the Government of Ontario's IEP and associated Directives do not identify electrification as an objective for the natural gas sector. Additionally, development of a common, aligned cost-effectiveness methodology across the natural gas and electricity sectors to ensure accurate and consistent evaluation of pipe/wire and non-pipe/wire alternatives is necessary.

OEB Staff Question #12

Are there any legal considerations or limitations relevant to the OEB's ability to approve funding for electrification or other non-gas IRP Alternatives under the OEB Act (natural gas rates)?

64. The OEB's jurisdiction under the *OEB Act* is broad and has historically been interpreted to encompass a wide range of matters related to natural gas distribution

[27] IEP, pp. 122 and 125.

rates and services. However, the jurisdiction is not unlimited – the OEB is an economic regulator not a social policy maker. The OEB's jurisdiction is limited to powers that are granted by statute or by necessary implication.[28] This does not extend to favouring one energy source over another. Additionally, the OEB's jurisdiction must be exercised in line with Ontario government policy.

65. This question raises issues that will depend on the specific nature, scope, and objectives of any proposal brought forward. In Enbridge Gas's view, these issues are best addressed in the context of concrete proposals where the facts can be better understood, so that an assessment is informed by the details of the alternative, its relationship to natural gas system needs, and the statutory, regulatory and policy framework in place.

OEB Staff Question #13

Do you have suggestions regarding the approach to identifying electricity system impacts triggered by an electrification IRP Alternative, or the approach to quantifying electricity system impacts in cost-effectiveness testing?

66. Enbridge Gas is firmly opposed to the ad hoc approach proposed in the Discussion Paper of engaging electric LDCs and the IESO to determine electricity system impacts for IRP Plans.

67. While OEB staff characterize the proposal as "a relatively straight-forward approach to considering electricity availability issues that builds on the approach in the [Southern Lake Huron] IRP Pilot Project", Enbridge Gas submits that the approach taken for limited electrification IRPA testing in a pilot context[29] is not comparable to

[28] *ATCO Gas & Pipelines Ltd. v. Alberta (Energy & Utilities Board)*, 2006 SCC 4, paras., 38 and 51.

[29] The number of participants proposed for electrification measures was only 30 for the Southern Lake Huron IRP Pilot Project. Due to the limited scale of the pilot, there is minimal impact to the electric LDCs in the affected areas. Furthermore, the pilot was not designed to avoid, delay, or downsize a natural gas facility project, and cost-effectiveness was not an objective.

the approach required for large-scale fuel switching that would be needed to avoid, delay, or downsize a natural gas facility project.

68. Unlike small-scale electrification IRPA testing in the context of the Southern Lake Huron IRP Pilot Project, ad hoc discussions without aligned cost-effectiveness assumptions and methodologies do not provide meaningful value and are not sufficient. Proper evaluation of electrification requires structured, integrated planning and consistent approaches across all parties. Common assumptions are essential not only between Enbridge Gas and electric LDCs but also among LDCs themselves, to ensure province-wide consistency. For example, a standardized method of estimating incremental building-level kW and kWh impacts from potential electrification of space and water heating is essential.

69. Regarding IRPA cost-effectiveness testing, OEB staff proposes incorporating electricity system upgrade costs into Phase 3 of the DCF+ test.[30] Enbridge Gas submits that this approach is not appropriate. The DCF+ test is specifically designed to compare IRPAs against a baseline natural gas facility[31] and was developed to evaluate benefits and costs associated with eligible IRPAs under the current IRP Framework, which does not include electrification.

70. If the DCF+ test were to be used to evaluate benefits and costs associated with electric IRPAs, two critical steps are necessary. First, consultation with the electricity sector is required to ensure that the current DCF+ test methodology can accurately reflect the benefits and costs associated with electric IRPAs, or to determine whether modifications to the methodology are required. Second, the electricity sector would need to be involved in the implementation of the DCF+ test given that the relevant electric LDC(s) and the IESO are the only entities that possess the requisite information (for example, cost impacts to the electric system).

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[30] Discussion Paper, p. 59.
[31] IRP Framework, p. 12.

71. Enbridge Gas notes that while the Company uses the DCF+ test for IRPA cost-effectiveness, electric LDCs use the Benefit-Cost Analysis ("BCA"). These methodologies are not comparable. To properly assess electrification as an IRPA, the evaluation must occur within the context of both the electric system and the natural gas system, and common cost-effectiveness methodologies must be established to ensure province-wide consistency and mutual agreement on the viability of potential alternatives. Furthermore, if electrification were to be considered at the scale necessary to avoid, delay, or downsize a natural gas facility project, it would need to be carried out by the electric LDC under their distribution expansion rules.

Chapter 8 – Framework Review Topic 4: Other Opportunities to Improve the Effectiveness and Efficiency of IRP Framework

OEB Staff Question #14

Do you support increasing the cost threshold at which IRP Plans require OEB approval, or do you have alternative proposals related to approval requirements?

72. Enbridge Gas supports increasing the minimum cost threshold for IRP activities requiring OEB approval to $10M, aligning with the threshold for Leave to Construct applications.[32] This change would reduce regulatory costs and expedite timelines for implementing IRPAs. It would also ensure that IRP solutions do not face more stringent approval requirements than pipeline projects. Enbridge Gas submits that there is no rationale for IRP solutions to have a lower cost threshold than pipeline projects.

[32] Pipeline projects under $2M do not require OEB leave to construct. For pipeline projects between $2M and $10M, Enbridge Gas may apply to the OEB for an exemption from leave to construct requirements, where the only issue in scope for the exemption application is whether duty to consult has been adequately discharged. Since the Ontario Ministry of Energy and Mines has not adopted this role for non-facility projects such as IRP Plans (i.e., regarding duty to consult obligations), exemption applications are not applicable to IRP Plans. Therefore, the comparable cost threshold for IRP Plans would be $10M.

73. Additionally, IRP Implementation Plan proceedings (as proposed in the Discussion Paper) will provide a formal venue for the OEB and stakeholders to engage on how IRP policies are applied for activities that do not require IRP Plan approvals. As a result, the IRP Implementation Plan approach combined with a higher project-specific IRP Plan cost threshold represents an appropriate balance between regulatory efficiency and oversight.

74. Enbridge Gas supports the continued cost recovery for implemented IRP Plans through the IRP Costs deferral accounts, along with the offsetting amounts that reflect the avoided capital costs associated with facility projects that are delayed, avoided, or downsized as a result of IRP activities. A preliminary methodology for calculating these offsetting amounts has been developed and would be appropriate to include within a proposed IRP Implementation Plan for review. However, Enbridge Gas notes that each IRP project may present unique circumstances that could require additional considerations in applying the methodology.

OEB Staff Question #15

How should the OEB address the implications of approval requirements regarding potential impacts of IRP Plans on Aboriginal or treaty rights?

75. Enbridge Gas supports OEB staff's proposal that no changes are required to the existing IRP Framework with respect to Indigenous consultation for IRP Plans that require OEB approval. As noted by OEB staff, the current IRP Framework requires Enbridge Gas to consult with potentially affected Indigenous groups in relation to IRP Plans that require OEB approval. Furthermore, the Ontario Ministry of Energy and Mines has not adopted the same role for non-facility projects such as IRP Plans as for Leave to Construct applications (i.e., regarding duty to consult obligations).[33]

76. Enbridge Gas engages with Indigenous groups on an on-going basis regarding a number of Company matters and activities. IRP activities that fall below the cost

[33] Discussion Paper, pp. 62-63.

threshold requiring OEB approval will continue to inform these consultations with potentially affected Indigenous groups as needed. Enbridge Gas does not believe that any changes to the IRP Framework are required in this context.

OEB Staff Question #16

Do you support introducing a cost threshold for mandatory evaluation of IRP Alternatives for growth-related projects? Why or why not?

77. Enbridge Gas supports the introduction of a cost threshold for mandatory IRP evaluation of growth-related projects (classified under the "Growth" Asset Class in the AMP) and recommends a minimum threshold of $2M. As noted in the Discussion Paper, the $2M cost threshold is also used by the OEB in its expectations for consideration of non-wires solutions for electricity distributors.[34] The introduction of this threshold aligns with the purpose of binary screening, which is to focus IRP evaluation on projects where there is a reasonable expectation that an IRPA could efficiently and economically meet the identified system need. Enbridge Gas also supports maintaining flexibility to consider IRPAs for projects below the threshold where project-specific circumstances may warrant further evaluation, at the Company's discretion.

78. Regarding OEB staff's recommendation that Enbridge Gas file its IRP Assessment Cost Threshold Screening of Growth Investments document as part of this IRP Framework Review, the Company notes that the document was developed in August 2024 and contains project and system information that is no longer current. It was originally developed to support establishing a reasonable cost screening threshold prior to conducting the DCF+ test on lower-cost growth projects. Since then, Enbridge Gas has completed technical and economic evaluations of all investments in the AMP. However, the rationale captured within the document is summarized below, along with updated learnings from IRP assessments.

[34] Discussion Paper, p. 65.

79. The proposed threshold is informed by Enbridge Gas's experience. Based on the latest Appendix B update filed as part of the 2026 Addendum,[35] 15 investments under the "Growth" Asset Class underwent IRP technical evaluation and no IRPAs were identified as optimal solutions at the economic evaluation stage. This outcome is attributable to two primary factors: the demand forecast profile in the project area, and the cost of IRPA implementation.

80. IRPA potential is strongly influenced by the project's associated demand forecast profile. When the demand forecast profile continues to increase across the 10-year period, it indicates the need for the facility alternative to be implemented. In such cases, supply-side and demand-side IRPAs cannot effectively address the system need, and consideration for IRPA implementation would not be a prudent use of ratepayer spend. Supply-side IRPAs would be most effective when deferring a system need beyond an apex point where the demand peaks and subsequently declines within the 10-year timeframe. However, this type of demand profile is uncommon based on investments reviewed to date.

81. From a cost perspective, IRPA potential for smaller dollar-value projects is very low given the magnitude of the base IRPA implementation costs relative to the facility cost. Demand-side IRPAs have not proven to be cost-effective compared to the facility alternative based on Phase 1 and Phase 2 results of the DCF+ test. For example, as presented in TWG Meeting #42, simplified IRP assessments using the lowest-cost assumptions were completed for two growth projects with facility cost estimates of $354,000 and $1,141,000. IRPA costs were found to be 13.7x and 7.3x higher than their respective facility alternatives. These results demonstrate that IRP Plan implementation costs for low-cost investments consistently exceed the facility costs by a significant margin, making technical evaluations for growth investments below $2M an activity that does not add value and has not resulted in viable IRP Plans.

[35] EB-2020-0091, Enbridge Gas Asset Management Plan ("AMP") Addendum 2026, October 30, 2025.

82. Enbridge Gas considered implementing a simplified evaluation process to estimate IRPA costs relative to facility costs through performing a system capacity assessment and applying generalized IRPA costs. However, the process would still require significant time and resources, as project-specific assessments are still being conducted and are not scalable for low-cost projects. Moreover, simplified evaluations would not yield different outcomes, given that IRPA costs for low-cost projects consistently and significantly exceed facility alternatives.

83. Therefore, introducing a cost threshold will better align the value-to-effort ratio by focusing IRP assessments on projects with higher IRPA potential. Enbridge Gas will exercise discretion in applying the cost threshold screening to growth projects where the demand profile significantly declines after the apex within the 10-year period.

84. In addition, Enbridge Gas proposes introducing a $10M minimum cost threshold for IRP assessments for Pipeline Replacement and Relocation Projects (classified under the “Distribution Pipe” Asset Class in the AMP). For replacement projects, the scope of the alternative is centered around downsizing the pipe (typically only a portion), which results in minimal cost savings due to the magnitude of other costs associated with replacement projects, including design, pre-work and labour costs. As noted in the latest Appendix B update filed as part of the 2026 Addendum,[36] 62 investments under the “Distribution Pipe” Asset Class underwent IRP technical evaluation, of which 56 investments failed technical evaluation. The 6 investments that proceeded to economic evaluation resulted in facility alternatives being identified as the optimal solution. Based on Enbridge Gas’s experience and the cost reduction that can be achieved with a pipe downsize, these projects have very limited technical and economic viability, and a higher threshold better aligns the value-to-effort ratio.

[36] EB-2020-0091, Enbridge Gas Asset Management Plan (“AMP”) Addendum 2026, October 30, 2025.

OEB Staff Question #17

Should the importance placed on the different phases of the DCF+ test be adjusted? Why or why not?
(a). Should this issue be considered as part of the process to update the IRP Framework, or as part of a subsequent proceeding (e.g., as part of the first IRP Implementation Plan proceeding)?

85. Enbridge Gas agrees with the principle of maintaining a strong focus on rate impacts within cost-effectiveness testing, as reflected in Phase 1 of the DCF+ test. This focus aligns with the IEP's emphasis on affordability as a core policy objective. However, for IRP activities specifically, Enbridge Gas recognizes that a singular focus on minimizing rate impacts may not be the optimal approach. Additional consideration should be given to the benefits and costs offered by IRPAs.

86. Accordingly, Enbridge Gas supports assessing the benefits and costs to existing and potential customers, as captured through the combined impact of Phase 1 and Phase 2, representing a total Enbridge Gas customer perspective. As a result, the updated IRP Framework should continue to state that Phase 2 should also be used to inform cost-effectiveness, specifically: "Enbridge Gas has some discretion to select an alternative to meet a system need that does not have the highest score on phase 1 of the DCF+ test...".[37] In this context, Enbridge Gas does not believe that changes to the IRP Framework are necessary .

87. In the Discussion Paper, OEB staff states that the current IRP Framework's emphasis on Phase 1 makes it very difficult for energy efficiency IRPAs to be selected as the most cost-effective option.[38] While Enbridge Gas agrees that Phase 2 should also be used to inform cost-effectiveness, as described above, the Company does not agree with the premise of OEB staff's concern. IRP cost-effectiveness methodologies should not be designed with the objective of

[37] IRP Framework, p. 12.
[38] Discussion Paper, p. 69.

maximizing the number of IRPAs that are implemented, nor should they favour specific types of IRPAs. Rather, these methodologies should be established in a manner that ensures the most appropriate solution to a given system need is pursued, in alignment with the objectives and guiding principles of the IRP Framework.

88. It is important to note that the results of the DCF+ test alone do not determine project selection. Project selection is also informed by other factors, including considerations of the underlying demand profile that is driving the capacity constraint, the comparison of relative bill impact amounts among alternative options, and qualitative considerations such as reliability, resiliency, energy security. Importantly, however, Enbridge Gas believes that detailed considerations regarding DCF+ methodologies and project selection are more appropriately addressed through the IRP Implementation Plan process, rather than through changes to the IRP Framework.

OEB Staff Question #18

Are there other changes to the cost-effectiveness approach used for IRP that should be incorporated into an updated IRP Framework (as opposed to subsequently considered through adjudicative review of the enhanced DCF+ test)? If so, what?

89. Enbridge Gas does not recommend any further changes to the IRP Framework regarding cost-effectiveness. Consistent with the response to OEB Staff Question #17, Enbridge Gas submits that detailed considerations regarding DCF+ methodologies and project selection are more appropriately addressed through the IRP Implementation Plan process, rather than through changes to the IRP Framework.

90. The Discussion Paper identifies “key points of non-consensus” among the IRP TWG, including whether and how some form of social cost of carbon should be

incorporated into Phase 3 of the DCF+ test.[39] Enbridge Gas submits that it is critical for the OEB to refrain from introducing carbon pricing mechanisms, including a social cost of carbon, into the IRP Framework. The imposition of such mechanisms is outside the intended scope of IRP and exceeds the OEB's jurisdiction as an economic regulator and creature of statute. Doing so would also conflict with the current policies and legislation of the Government of Ontario that prioritize customer choice and energy affordability, affirm the critical role of natural gas in the provincial energy mix,[40] and oppose any new carbon tax, charge or levy absent a referendum.[41]

Overall

OEB Staff Question #19

Do you have any other comments or suggestions regarding changes to the IRP Framework?

91. The IRP Framework currently outlines the requirement for stakeholder outreach and engagement, which includes three components: (#1) Gathering of Stakeholder Engagement Data and Insight; (#2) Stakeholder Days; and (#3) Targeted Engagement.[42] The original intent for the annual regional stakeholder events (i.e., #2) was to provide updates on IRP activities, particularly in relation to specific needs and constraints identified in the AMP, and potential IRP Plans. These events occur annually following the AMP update.

92. Based on the IRP assessments completed to date, only one project has been identified where an IRPA is the optimal solution compared to the facility alternative,

[39] Discussion Paper, p. 68.
[40] IEP, pp. 14 and 95.
[41] *Protecting Against Carbon Taxes Act, 2024*, S.O. 2024, c. 9, Sch 5, s. 1.
[42] EB-2020-0091, OEB Decision and Order, July 22, 2021, pp. 63-67.

and no IRP Plans have been developed. In the absence of potential IRP projects or IRP Plans to provide updates on, there is limited justification for conducting annual regional stakeholder events. Proceeding with regional events without substantive new content may diminish stakeholder interest and result in inefficient resource allocation, without delivering meaningful value to participants or advancing IRP objectives. Furthermore, initial learnings from the Southern Lake Huron IRP Pilot Project indicate that engagement on specific projects is most effective when focused on stakeholders located directly within a project area, rather than broadly at a regional level.

93. To improve the effectiveness and efficiency of stakeholder engagement, Enbridge Gas recommends removing the requirement to host annual regional stakeholder events and allow flexibility in how broader IRP updates are communicated. Targeted engagement would continue to be conducted for any project-specific IRPA or IRP Plan, initiated when IRPAs are actively being considered as viable alternatives to address system needs and during the development and implementation of IRP Plan proposals.