

VIA RESS

November 19, 2025

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

Dear Ritchie Murray:

**Re: Ontario Energy Board
Review and Evaluation of the Integrated Resource Planning (IRP) Framework
Consumers Council of Canada (CCC) Comments
OEB File No. EB-2025-0125**

In accordance with the OEB's letter, dated October 6, 2025, please find attached CCC's comments on the Integrated Resource Planning (IRP) Framework review.

Yours truly,

A handwritten signature in cursive script that reads "Lawrie Gluck".

Lawrie Gluck
Consultant for the Consumers Council of Canada

Background

The OEB issued the OEB Staff Discussion Paper on the Review and Evaluation of the Integrated Resource Planning (IRP) Framework on October 6, 2025 (OEB Staff Discussion Paper). The OEB Staff Discussion Paper provides a summary of IRP progress to date and several proposed changes to the IRP Framework.

The Consumers Council of Canada (CCC) provides brief comments on the results of the IRP Framework to date and OEB staff's proposed changes to the framework below.

CCC Comments

The IRP Framework has not resulted in any actual financial benefit to ratepayers. To date, there has been one small IRP project implemented and, as acknowledged by OEB staff, there have been material incremental costs incurred to implement the IRP Framework.¹ The OEB Staff Discussion Paper notes that, in 2023, \$3.1 million of incremental IRP-related costs were incurred with limited pipeline infrastructure avoided/deferred.² Therefore, ratepayers have incurred incremental costs with no coincident benefit. This is clearly an unacceptable outcome for ratepayers.

CCC submits that the OEB should pause its work on the IRP Framework at this time. The OEB should await the completion of the pilot projects that have already been implemented or approved³ and any other pilot projects that are expected to be implemented imminently⁴ prior to making changes to the IRP Framework. The OEB should review the final results from these pilot projects with respect to the actual IRP-related implementation costs incurred, the actual infrastructure costs avoided/deferred, and any lessons learned.

After the actual results of the IRP-related pilot projects are known, the OEB should, at that time, reconsider the IRP Framework and whether it is providing any actual value to ratepayers. This timing may allow for the IRP Framework to be more effectively considered

¹ [OEB Staff Stakeholder Presentation re: IRP](#), October 22, 2025, p. 7.

² [OEB Staff Discussion Paper](#), October 6, 2025, pp. 17-18. \$2.7 million of the total \$3.1 million of IRP-related costs incurred were associated with administrative functions. In addition, there are also incremental costs associated with the IRP Working Group that have been and continue to be incurred.

³ *Ibid.*, pp. 16-17. East Kingston Creekford Road Project and Southern Lake Huron Project.

⁴ *Ibid.*, p. 16. It appears that the only additional IRP-related pilot project noted in the OEB Staff Discussion Paper that can be described as imminent is a system pruning project that is expected to be implemented beginning at the end of Q1 2026.

in the context of coordinated electricity/gas planning as those planning activities mature over time.