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November 19, 2025

EB-2025-0125 OEB Evaluation of the IRP Framework
Pollution Probe Comments

Dear Mr. Murray:

Pollution Probe received the notice for the above noted consultation related to Evaluation of the Integrated Resource Plan (IRP) Framework (Framework) and attended the Ontario Energy Board (OEB) stakeholder session on October 22, 2025. On October 6, 2025, the OEB also issued an OEB Staff Discussion Paper[1] related to the IRP Framework Review, which included specific questions. As requested by the OEB, below are Pollution Probe's comments and responses to those questions.

OEB Staff proposes an incremental evolution of the existing Framework, including several proposed changes that are likely to better reflect the general principle that Enbridge Gas (Enbridge) should be implementing the solution that is in the best interest of Enbridge and its customers. OEB Staff proposals would also enable Enbridge to continue efforts to gain learnings on IRP, even where it is not the most near-term cost-effective approach to address system needs. This could better position the OEB and Enbridge Gas to deploy IRP at greater scale, should the opportunity arise[2]. Pollution Probe agrees that a continued evolution for natural gas IRP makes sense, is in the public interest and also that areas of the Framework should be strengthened to bridge the existing gaps that have posed a barrier to delivering effective and tangible IRP outcomes since the Framework was initiated in 2021.

As noted by OEB Staff, there are a number of previous and ongoing proceedings considering aspects of IRP implementation and this is appropriate given that successful IRP requires an integrated consideration along the lifecycle of natural gas planning and execution. Aside from the Framework review, there are also currently outstanding IRP deliverables stemming from several OEB Decisions (e.g. pilot projects, pruning project implementation by Q1 2026, stranded asset factor inclusions in Capital planning, etc.) that needs to be completed.

[1] OEB Staff_Discussion Paper_IRP Framework Review_20251006.
[2] OEBltr_IRPFrameworkReview_20251006.

Overall, the Framework established in 2021 was a good initial foundation and there has been a significant amount of learning that has occurred that will inform the OEB to make purposeful changes to the Framework and application of the Framework through the variety of proceedings that relate to IRP issues (including rates cases, Capital applications, Annual Gas Supply Plans, IRP related account clearances, etc.). A primary purpose of IRP is to avoid, delay or reduce facility projects, and has additional benefits including the potential to mitigate excess Capital and stranded assets. Effective IRP consideration through the full planning lifecycle (i.e. supply, demand and infrastructure options) leads to more efficient Capital planning and execution[3].

Given the relevance of IRP-related issues across the full lifecycle of planning and execution activity for the natural gas utility, IRP has appropriately been an element of consideration across a wide range of Enbridge applications. Although there has been challenges related to advancing tangible IRP results (pilot and non-pilot), OEB proceedings have advanced requirements including efforts to overcome the barrier of a natural bias for the utility to install Capital projects over IRP alternatives. These barriers have been well documented and considered by the OEB in previous proceedings[4].

In alignment with the principle to avoid, delay or reduce excess Capital spending, the OEB has recently applied adjustments to avoid excess Capital spending, including a requirement from the Enbridge Rebasing Phase 1 Decision for Enbridge to mitigate its proposed Capital plan by $250 million for 2024, year one of the current rebasing term[5]. Enbridge was able to update its Asset Management Plan (through avoiding, delaying or reducing Capital projects) within the more prudent Capital envelope and without any adverse safety or operational issues[6]. Although this approach by the OEB was not specifically labelled as IRP, it achieved the same outcome in a very efficient manner and demonstrated the value and benefits of a critical review and assessment of the utility Asset Management Plan. It is not likely that a utility will effectively implement IRP if it is over-capitalised and has a long-term financial interest to maximise Capital spending instead of more cost-effective IRP options. It would be expected to see more IRP alternatives put forward when a utility does not have access to excess Capital. Framework changes can be helpful, but applying IRP requirements across the broad range of utility proceedings is where the rubber hits the road for ratepayers.

The OEB Staff Discussion Paper (Appendix A) included a consolidation of the questions included in the paper. Below are the questions and responses. It is expected that a more fulsome assessment of these issues would occur in the adjudicated process proposed by OEB Staff.

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[3] Including better consideration of the real needs for Capital projects like done for the East Kinston Project documented in EB-2024-0125.

[4] Including the recent Cost of Capital review (EB-2024-0063)

[5] EB-2022-0200 dec_order_EGI_2024 Rebasing_Phase I_20231221, Page 2, item 2.

[6] EB-2020-0091 EGI_AMP_2025-2034_20241108, Page 17.

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?

The current public policy environment is strongly aligned with intended results that would come from an effective natural Gas IRP Framework. Ensuring cost-effective energy planning outcomes in alignment with the public interest are core to the OEB's focus and public policy. This includes avoiding excess Capital spending and cost-effective alternatives to traditional Capital infrastructure. Policy alignment was strong when the Framework was initially established and the underlying basis for IRP is even more pertinent today and will continue to gain importance as the energy transition continues to accelerate. It is more important than ever that scarce ratepayer funds be allocated to areas that are future-focused and do not have a high risk of stranded assets. The principles and intent of IRP is directly connected to required fiscal prudence for natural gas Capital projects and consideration of cost-effective alternatives (including avoiding, delaying or reducing facility projects) as part of integrated planning and aligned with the interest of Ontario energy consumers.

There is a general consensus that the energy transition (in Ontario and globally) is focused on efficient electrification with the vast majority of funding and technology focus and advancement aligned with the energy transition. This trend aligns with industry expert confirmation, including in recent OEB proceedings[7]. For example, London Economics International (LEI) indicates that:

> "*The term 'energy transition' refers to a shift from an energy system that primarily relies on fossil fuel-based energy sources (such as natural gas, coal and oil) to net zero-emitting renewable energy sources (such as batteries, solar and wind power, and carbon capture and storage). Electrification of heating and transportation is often a large part of such policies, with impacts on regulated utilities in both the electricity and gas sectors.*"[8]

Future focused solutions align with the energy transition and related policy. Ontario's recently released Integrated Energy Plan (IEP)[9] is extremely dominant in its focus on electrification, integrated energy planning and the energy transition already underway. This is further complimented by the Provincial Cost Effective Energy Pathways Study for Ontario[10], released at the same time as the IEP. Additional policy alignment exists across Ontario, including community/municipal energy and emission plans focused on net zero objectives[11]. Strengthening the IRP Framework is critical to ensure that it can produce the intended outcomes in alignment with current policy objectives.

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[7] Including expert witnesses in the recent Generic Cost of Capital proceeding (EB-2024-0063).
[8] EB-2024-0063 Exhibit M1, page 44
[9] Energy for Generations
[10] Cost Effective Energy Pathways Study for Ontario
[11] Municipal plans focus on net zero by 2040, 2045, or 2050.

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

OEB Staff proposed that an update to the IRP Framework is desirable, both to reflect developments since 2021 and to incorporate any further changes arising from this consultation that the OEB determines to be appropriate. Pollution Probe understands that the OEB Staff also meant that the range of OEB Decisions and direction related to IRP will also be in scope. The OEB Staff Discussion Paper noted a high-level question whether the current form of the IRP Framework (i.e., part of a Decision and Order applicable only to Enbridge Gas) should continue. Pollution Probe suggests that this approach is the most appropriate, effective and efficient. Moving to a distinctly different approach (as outlined by other options in Table 5 of the OEB Staff Discussion Paper, page 37) would not be efficient or effective and would lead to uncertainty and delays in advancing natural gas IRP in a timely manner. Adjustments (as noted below) can be made by the OEB to make the IRP Framework more effective and to bridge gaps that have been identified.

It is important to maintain continuity to avoid delays and confusion. The current IRP requirements are defined by the IRP Framework and related OEB Decisions. The focus has been appropriately applied to Enbridge with the ability for other natural gas distributors to leverage the Framework, as appropriate. Pollution Probe agrees with that as a reasonable approach. It is important that the OEB reinforce that the IRP-related requirements remain in place unless the OEB specifically makes a specific change. Failure to do this can lead to confusion, ambiguity or selective application. For example, with the passing of time since the IRP Decision[12] and without additional OEB reinforcement, Enbridge had indicated that it assumed that Enbridge did not need to proceed with the two IRP Pilot Projects ordered by the OEB and Enbridge suggested that proceeding with one delayed pilot project was enough to meet the spirit of meeting OEB's order[13]. The OEB reconfirmed that the OEB Order remains in place and that Enbridge is expected to comply with this OEB direction since there was no subsequent order to change or rescind the original order.

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

The current Framework has been applied primarily to Enbridge which makes sense given that Enbridge represents the vast majority of natural gas customers in Ontario and that implementation issues are still being worked through. Once IRP is working well at Enbridge and there is a steady stream of IRP projects being implemented, the OEB could considered more formal requirements for other rate regulated gas distributors. It does not make sense to

[12] EB-2020-0091.

[13] EB-2022-0335 REVISED Final Transcript for EB-2022-0335 Technical Conference August 27 2024, Page 142, lines 14-20.

mandate implementation across small distributors until IRP results are flowing well from Enbridge. The OEB has encouraged other rate regulated gas distributors to consider IRP alternatives where appropriate and this option should remain open to those distributors as a consideration.

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?

When the IRP Decision (EB-2020-0091) and related Framework were issued it was believed that they should provide the appropriate direction for Enbridge to successfully implement IRP and deliver tangible IRP results. As the OEB Staff Discussion Paper notes, the expected IRP results have not occurred due to a variety of reasons. Even the two IRP projects that should have been easy to complete prior to the end of 2022 have not been delivered many years later[14]. Progress through the OEB IRP Technical Working Group (TWG) has not been as effective as anticipated and the OEB IRP TWG reports since 2021 also outline a variety of roadblocks that have limited progress. It is important to review and consider the OEB IRP TWG member comments in all of the annual reports published since 2021 to get a full understanding of the challenges identified. The OEB ordered that IRP Regional sessions be held annually to share information on Asset Management Plan project needs and solicit feedback on IRP solutions. This process has diverged from what was intended and has not provided detailed information on the Capital projects that are being screened or resulted in IRP projects. Execution of the IRP requirements appears to reflect minimum regulatory requirements and not a concerted effort to achieve IRP results. Stakeholders have noted concern on whether regulatory requirements are even being met[15].

Although the OEB IRP TWG has a broad range of stakeholders and expertise, it has no authority to affect greater progress or require Enbridge to provide the information requested[16]. Many of the requests and recommendations from the OEB IRP TWG have remained unimplemented, often due to the fact that they are peripheral to the Asset Management Plan activities already proceeding at Enbridge. Some key decisions and changes have been implemented by Enbridge with little to no coordination with the OEB IRP TWG. The OEB Staff Discussion Paper has identified some of the limitations that are blocking the OEB IRP TWG from achieving progress and the Discussion Paper has recommended a more limited scope for the OEB IRP TWG and that OEB direction and adjudication be used to address the gaps initially meant to be addressed through the OEB IRP TWG.

[14] The updated Southern Lake Huron Pilot Project was filed in 2024 and is currently being implemented.
[15] Examples include EB-2022-0133, Exhibit N1, Tab 1, Schedule 1, Page 12 and OEB IRPWG_2022AnnualReport_06302023, Table 2.
[16] Examples referenced in OEB IRPWG_2022AnnualReport_06302023, Table 2.

Closing the gaps that have restricted tangible IRP results will require additional details to be added to the Framework, plus OEB follow-up on the related Decisions issued. However, adding additional detail to the Framework alone will not drive the progress needed. Greater measurement and transparency on activities and progress is required and the OEB will need to ensure that IRP is firmly included in the scope of all relevant proceedings (e.g. AMP and Capital requests for rate cases, facility applications, Gas Supply Plans, etc.). What gets measured, gets managed and this approach will need to be applied to the proposed IRP Implementation Plan.

There have been OEB Decisions that are supplemental and/or complimentary to the Framework and those Decisions need to be considered in application of the Framework. The OEB may prefer to integrate certain OEB Decision references into the Framework as part of the update process or simply note that the Framework must be considered in association with all related OEB Decisions and direction. IRP elements are part of several active proceedings and are likely to be part of future proceedings. Therefore, it is important to not to consider the Framework document a siloed document, even if the OEB enhances the Framework based on all Decisions since 2021.

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?

OEB Staff proposes a new requirement for Enbridge to file a forward-looking IRP Implementation Plan compatible with the updated IRP Framework, covering a defined period (to be determined, e.g., three years) to be reviewed through adjudication. Pollution Probe supports this concept, but some issues will need to be worked through in order to make this effective. It must also be clear that additional OEB direction may be provided that is supplemental or complimentary to the IRP Implementation Plan and the Implementation Plan should summarize the full range of IRP requirements and outcomes achieved against those requirements. Developing a scorecard may also a useful tool, like done for annual Gas Supply Plans.

An IRP Implementation Plan would be useful to help drive transparency, accountability and progress. Three years is too short a period and is in conflict with the three year exemption criteria that Enbridge has relied on for many project exemptions (i.e. if the implementation plan includes only items with a three year timeframe, they could all end up being dismissed under the three year exemption criteria). A five to ten year rolling plan updated on an annual basis would be more appropriate. An annual rolling five year plan is used for the Gas Supply Plan and this type of approach is more appropriate. Also, the annual rolling ten year Asset Management Plan (AMP) is filed annually and is central to any IRP Implementation Plan since the rolling AMP includes the universe of projects where IRP can be applied. It may make sense to ensure that

the timing and requirements of the annual AMP filing be aligned with the annual IRP Implementation Plan so that they both refer to the same set of Capital projects. It will also ensure that analysis and wording in the annual AMP correlates to the information included in the annual IRP Implementation Plan. Given the nature of Enbridge's rebasing applications, it will be important to align review of the AMP and IRP plans with the rebasing application in years when that occurs (i.e. review separately, except every 5 years when a rebasing application is filed).

Implementing the IRP Implementation Plan could begin as soon as the requirements are fine-tuned and this does not need to be perfect at the start, similar to the IRP Framework. Improvements can be made on an annual basis as part of the continuous improvement process and as additional issues are identified. In parallel, there are several systemic issues that need to be addressed that will help improve the IRP Implementation Plan and help ensure IRP progress. Many of these are noted in the appropriate sections of this submission.

The scope of what is required to be filed in the annual IRP Implementation Plan should also include process, policy or document updates made by Enbridge that relate to IRP. This will provide the OEB and stakeholders an opportunity to understand what changes Enbridge has made to improve IRP implementation. An example would include the updated process diagram that Enbridge recently developed in August 2025 and filed in the 2025 Gas Supply Plan proceeding[17]. Enbridge indicated that this updated diagram represents how IRP is actually implemented by Enbridge, compared to how it was done following the IRP Framework establishment[18]. It appears that the new Enbridge process may not be aligned with OEB direction to Enbridge on IRP and resolving any ambiguity should be a priority. Similarly, Enbridge has made changes to its internal IRP guidelines and a annual review of that document would help ensure that it is aligned with current IRP requirements.

Finally, the review of IRP to-date including via the OEB IRP TWG has been at a level that is cursory to the collective challenges which have been impeding tangible IRP progress. Delving into the details of those challenges in a consolidated manner would help provide the transparency and focus needed to get IRP on track. This can be done annually via the IRP Implementation Plan, but an initial detailed review could be best informed through a third-party audit, like what has been done via Demand Side Management (DSM) annually for the past thirty years. The exact scope would need to be determined by the OEB, but a third-party audit of IRP should include all IRP processes, regulatory requirements, auditing of project reviews (like done with DSM projects), and a review of IRP application to the AMP process to identify gaps and opportunities. Given the significant success of the Capital plan update for the 2025-2032 AMP that avoided, delayed or reduced $250 million in Capital projects, this specific process should be included to provide opportunities to use outcomes from that process to

[17] EB-2025-0065 Exhibit I.6-PP-15.
[18] OEB_EB_2025-0065_20250916_VOL1_87717{FURTHER REVISED}, Page 145.

avoid, delay or reduce additional projects as part of the AMP process, which includes IRP screening and alternatives.

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?

Pollution Probe agrees that there has been challenges which have diminished the effectiveness of the OEB IRP TWG. Much of this stems from the lack of ability to influence the IRP activities conducted by Enbridge and the limited timely information made available. OEB IRP TWG member are not involved (or even aware of) the full range of IRP activities and requirements. For example, most of the IRP TWG members have not been involved in IRP related proceedings and have not participated in the annual regional IRP consultation processes. A review of best practices and approached from the past thirty years of DSM committees could provide some value and insights. When DSM was initially launched by the OEB, there was a more granular focus (including audits) until the process was delivering what was intended.

A reduced and more focused role for the OEB IRP TWG makes sense, with the elements outside the OEB IRP TWG control being transferred over to the adjudicated processes. The OEB IRP TWG membership should also be more reflective of Ontario specific perspectives. Having greater overlap with stakeholder representation that is aware of the broader IRP-related proceedings (e.g. the Enbridge Rebasing proceedings) could help drive greater progress. The OEB IRP TWG only gets visibility to the narrow portion of information shared through the OEB IRP TWG. This makes it impossible for the OEB IRP TWG to provide a comprehensive assessment of all IRP activities or progress.

As long as the requirements in the IRP Implementation Plan are clear, it could make sense to have OEB IRP TWG comments added to an appendix of the IRP Implementation Plan annually. This is distinctly different from a sign off of the Implementation Plan, since the OEB IRP TWG is not in a position to do a thorough review and sign off of the IRP Implementation Plan, prior to the adjudicated proceeding.

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?

OEB Staff propose to define innovation-related IRP proposals as discrete initiatives intended to advance IRP learning and inform IRP implementation through the testing of new technologies, approaches or practices. Given that the purpose of IRP is to avoid, delay or reduce facility projects, it is important that innovation-related proposals avoid technologies and approaches that have the potential to further lock in the use of natural gas, particularly in areas of the system that are expected to be uneconomic (i.e. residual customer revenues are less than system costs). The OEB previously confirmed that promoting natural gas solutions is part of the

natural interest for Enbridge to grow or retain customers and that funding intended to reduce natural gas use (i.e. DSM and/or IRP) should be not used for those purposes. Incenting natural gas technologies through DSM/IRP incentives creates a further barrier to IRP and future system pruning.

An adjustment to the draft definition could help mitigate this issue. The OEB could consider defining innovation-related IRP proposals as discrete initiatives intended to advance IRP learning and inform IRP implementation through the testing of new technologies, approaches or practices that do not promote the use of natural gas or potential for system pruning.

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?

Given that innovation-related IRP proposals are primarily intended to support learning and future IRP implementation, OEB Staff proposed that they should be assessed through a process distinct from that used for IRP Plans designed to meet identified near-term system needs. Pollution Probe recommends that innovation-related project portfolio progress be summarised in the annual rolling IRP Implementation Plan, but that the projects be assessed and approved through a separate mechanism as proposed by OEB Staff. Given the delays in advancing innovation-related proposals (currently called IRP Pilot Projects), it is important to have annual visibility in the adjudicated IRP Implementation Plan proceeding to ensure progress is being made. It is unclear how the OEB's compliance mechanism fits into this approach. Comments related to each of the four oversight mechanism is noted below.

Oversight Mechanism	Comments
1) Advance project-specific approval by OEB	This is the current approach and worked well for the first IRP Pilot Project once it was brought forward by Enbridge. It was valuable to use this approach since the project initially submitted by Enbridge had issues that were addressed through the proceeding process.
2) Advance review and endorsement by the IRP Working Group with pre-determined criteria	This approach is not recommended and is not likely to succeed. As noted previously, the IRP TWG is not well positioned to conduct a thorough review of proposed projects, request incremental information, or direct Enbridge to make required adjustments. An adjudicated process has the elements needed for a successful review and approval and the OEB IRP TWG does not.

Oversight Mechanism	Comments
3) Advance approval by the OEB of an IRP Implementation Plan	This approach could work since it provides a similar approach as option 1 (it is an adjudicated approach). The OEB could indicate that innovation-related proposals can be considered by the OEB in either a stand-alone application or as part of the annual IRP Implementation Plan proceeding. This would provide optimal flexibility and enable broader input and transparency.
4) No advance review and approval	This is not a recommended approach, particularly until innovation-related proposals (or IRP Pilots as currently termed) become a more routine occurrence. A formal OEB review is the most prudent approach in the near-term, regardless of the project size. This approach could be adjusted once a track record is build of successful proposals approved by the OEB.

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?

The OEB Staff Discussion Paper suggested that when developing or seeking approval for an innovation-related IRP proposal, Enbridge should be required to address five considerations. Overall the considerations look appropriate. However, Pollution Probe recommends a minor edit to one and addition of a sixth consideration.

It is recommended that consideration #1: **Potential to Address System Needs**, be adjusted to allow for this consideration to be flexible when there is an appropriate rationale. This was applied in the Southern Lake Huron IRP Pilot Project[19], which did not address a specific system need, but is still expected to bring some learnings to IRP that can be applied to other future projects. The OEB approved the project on that basis.

Pollution Probe recommends that a sixth consideration be added to the list to ensure that any innovation-related projects meet the intended purpose of IRP and do not lead to the potential to lock in the use of natural gas based on the technologies being applied. The proposed addition is: the proposal must not include technologies that promote the use of natural gas or could lead to locking in the use of natural gas or pose a barrier to future system pruning.

[19] EB-2022-0335.

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

Yes, Pollution Probe supports expanding electrification as an eligible IRP Alternative beyond the current pilots. This aligns with a modern approach that provides consumer choice in alignment with policy and industry trends as the energy transaction continues to accelerate. Failure to allow electrification as a technology option creates a barrier to the largest opportunity of modern technologies.

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)?

Yes, it makes sense to enable electrification as an alternative to new customer connections, particularly when efficient electrification options are more costs effective than the total costs incurred for installing natural gas. The costs to add gas infrastructure to serve new customers has been rapidly increasing and in many cases is bordering on failing the OEB's economic tests. Undertaking a pilot would be a good approach to evaluate costs and benefits (including benefits of avoiding potential stranded assets risks). The OEB could also consider a pilot where other program delivery agents (e.g. IESO, municipality, etc.) deliver the electrification options if they already have the administrative structures in place.

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)?

There do not appear to be any legal limitations. Pollution Probe believes that the OEB has the authority and mandate to enable affordable energy solutions in the public interest that align with industry and policy direction. The OEB has also already enabled electrification or other non-gas IRP Alternatives for the purposes of DSM. IRP includes targeted DSM in a specific area.

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?

To present, there has been very limited IRP results in total. IRP alternatives are typically meant to target specific areas which do not have large scale impacts relative to an electricity distributors' system. Ontario electricity distributors have routinely indicated that they do not have concerns with customer electrification and they are managing their grids to handle this transition. This is true even in the municipalities that have the most aggressive net zero targets (e.g. Toronto). The scale of IRP projects that are likely to be reviewed by the OEB will have limited impact on the electricity grid and have been confirmed by electricity distributors as not

being of concern. Electrification measures already align with current electricity distributor capacity planning and the Distribution Service Code[20]. It is important that a thoughtful approach is used that does not induce excess administration.

The OEB could also consult with a sample of electricity distributors (perhaps through an existing forum like the DER committee) to identify a threshold in which an IRP proposal should involve more detailed analysis. This is an approach typically used with DERs to avoid excess administration and delays. The local electricity distributors are the foundational level of planning that is used and if a local electricity distributor does not have any issues with the range of electrification proposed in an IRP proposal, it will not have any larger scale impacts. This is consistent with protocols already in place for system planning and operation in Ontario.

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?

It is not recommended to increase the threshold at this time. Doing so would exacerbate some of the current challenges and would have no actual benefits based on the current trajectory of IRP plans. It is recommended that the threshold be maintained for now, but the OEB should consider what issues or challenges have resulted from IRP projects which were developed below the threshold.

Another issue that the OEB may wish to consider is where the appropriate place is to review projects and related costs that are below the threshold. There appears to be a desire for the OEB to mechanize certain account clearance proceedings, but if an IRP project is intended to be reviewed in detail by the OEB in one of those proceedings, the format of the proceeding will need to be sufficient to allow that to happen.

15. How should the OEB address the implications of approval requirements regarding potential impacts of IRP Plans on Aboriginal or treaty rights?
No comment at this time.

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

The OEB requires Enbridge to consider IRP when developing and updating its full Capital portfolio, subject to any specific exemptions. There does not appear to be a logical rationale to setting a cost threshold for IRP consideration. Smaller projects may also have the greatest ability to apply successful IRP alternatives and collectively they could equate to a large Capital

[20] Homes with EVs and electric air source heat pumps have been served from 60 AMP services previously and the current standard is a 200 AMP service which is more than ample for any proposed IRP alternatives.

savings and reduction in stranded asset risk. Removing smaller projects from consideration could undermine one of the greatest opportunities for IRP.

The OEB may be tempted to apply the same limit used for a Leave to Construct exemption, but this is an apples to oranges comparison. The Leave to Construct requirements were developed for a specifically different purpose than the IRP Framework. A Leave to Construct project includes many impacts that generally increase based on the size and scale of the project (e.g. environmental and socio-economic impacts and related mitigation requirements). The OEB has in place a parallel process (EBO 188 Environmental Screening requirements) to identify and mitigate project impacts that do not go through a formal Leave to Construct process. The same does not apply to Capital projects for IRP purposes.

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)?

There has been ongoing challenges related to the DCF+ test. It is not clear that the DCF+ approach Enbridge is using is appropriate or working as intended. Despite thousands of Capital projects being identified through Enbridge's Asset Management Plan since the launch of the IRP Framework, no actual IRP alternatives have made it past Enbridge's internal screening approach. It is recommended that the cost effectiveness test be reviewed as part of the adjudicated proceeding to ensure it is appropriate and that changes be considered, as appropriate.

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?

Please see comments in #17. Also, if the OEB determines that the DCF+ test (or its application) is not appropriate, the OEB should consider what cost-effectiveness approach is appropriate to advance natural gas IRP results. This could include using the Societal Cost Test, TRC+ (used for DSM), or other options. There may also be additional benefits that are not currently being included. The OEB recognized that stranded asset risk affects all aspects of Enbridge Gas's system and its proposals for capital spending on system expansion and system renewal[21]. Avoiding these risks have real value that is not currently considered. The OEB has already requested that Enbridge include consideration of stranded asset impacts and options as part of its Capital planning and IRP is also part of that process.

[21] EB-2022-0200 dec_order_EGI_2024 Rebasing_Phase I_20231221, Page 2.

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

There was confusion over the application of the three year exemption and the OEB provided some clarity that it should not be applied in a loose manner to avoid IRP consideration. It could make sense to remove this element or provide clarity to ensure that it is applied correctly.

IRP plans and analysis submitted with Leave to Construct applications has been generally incomplete and focused on narrow sub-elements (e.g. Posterity analysis of limited DSM program application), thereby underestimating IRP potential. A dedicated effort may assist with developing a template for future reference. Several Ontario municipalities has signaled interest in have a combined IRP/DSM plan developed for their areas to align with the energy and emissions plan. This could be a good project for the OEB IRP TWG to lead in coordination with interested stakeholders.

Significant opportunities exist for the use of interruptible rates to reduce peak demand. This is an underused tool that requires more attention. A pilot could be considered to test the impact of different rate designs using best practices.

Respectfully submitted on behalf of Pollution Probe.

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