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November 19, 2025

Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
2300 Yonge Street, P.O. Box 2319  
Toronto ON, M4P 1E4

Dear Mr. Murray,

**RE: EB-2024-0125 IRP Framework Review  
Comments of Energy Probe on the OEB Staff Paper**

In its October 6, 2025, Decision on Cost Eligibility, the OEB invited participants in the IRP Framework Review to submit written comments on the OEB Staff Paper by November 19, 2025. The comments of Energy Probe are attached. They are presented as answers to Staff Paper questions.

Submitted on behalf of Energy Probe.

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe)

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## Energy Probe Answers to Staff Paper Questions

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?*

### Energy Probe Answer

The current policy environment recognizes the continued use of natural gas.

"Ontario will continue to support the important role of natural gas in Ontario's energy system and economy while pursuing options to lower costs and reduce emissions through energy efficiency, electrification, clean fuels (e.g., renewable natural gas, low-carbon hydrogen) and carbon capture and storage."

The current policy environment does not promote phasing out of natural gas distribution.

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

### Energy Probe Answer

EP prefers the third option where OEB drafts and issues a non-adjudicated updated IRP Framework as a policy document that is also applicable to other gas distributors. EP assumes that this policy document would be issued as a draft for comments by stakeholders after which it would be issued for OEB approval similar to how amendments to OEB codes are handled. EP believes that this would be simple and fair.

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

### Energy Probe Answer

It should be applicable to all rate-regulated gas distributors.

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?*

## Energy Probe Answers to Staff Paper Questions

### Energy Probe Answer

EP believes that the level of detail in the current IRP Framework strikes the appropriate balance.

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?*

### Energy Probe Answer

In general EP supports the OEB staff proposal for an IRP Implementation Plan except for the proposed role for the IRP Working Group.

EP believes that the IRP Implementation Plan should be developed and reviewed as part of rebasing applications by distributors. EP believes that the IRP Implementation Plan should be integrated with the Distribution System Plan of each distributor and that both be reviewed and approved by the OEB every five years at rebasing. This would ensure that there are no conflicts between the DSP and the IRP.

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?*

### Energy Probe Answer

EP is concerned that most of the current members of the IRP Working Group would like to phase out the use of natural gas while the Ontario government supports continued use of natural gas. EP believes that the membership of the IRP Working Group should be changed to ensure that it is not biased against natural gas. If that is not possible IRP Working Group should be disbanded.

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?*

### Energy Probe Answer

EP believes that innovation is a core competency of business management and there is no need to single it out for special treatment. Having said that if innovation is to be encouraged it must not exclude any fuel or source of energy.

## Energy Probe Answers to Staff Paper Questions

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?*

### Energy Probe Answer

EP supports the 3<sup>rd</sup> oversight mechanism "advance approval by the OEB of an IRP Implementation Plan" because it does not involve the WG and provides more certainty and stakeholder input.

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?*

### Energy Probe Answer

EP believes that special treatment is not needed for value-driven innovation.

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

### Energy Probe Answer

EP does not support expanding electrification as an eligible IRP Alternative. Natural gas distributors do not have expertise in electrification. Electrification is the responsibility of electricity distributors. The question assumes that electrification is a desirable goal which seems to be in conflict with government policy that supports continued use of natural gas. Natural gas ratepayers should not be forced to fund expansion of the electricity system.

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)?*

### Energy Probe Answer

There is no value of a pilot that excludes natural gas.

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)?*

### Energy Probe Answer

## Energy Probe Answers to Staff Paper Questions

The question assumes that electrification is desirable goal which seems to be in conflict with government policy that supports continued use of natural gas. Energy Probe believes that the OEB does not have the authority to force natural gas ratepayers to pay for electricity system expansion.

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?*

### Energy Probe Answer

EP is opposed to electrification natural gas IRP alternatives.

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?*

### Energy Probe Answer

EP does not support increasing the cost threshold at which IRP Plans require OEB approval.

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

### Energy Probe Answer

EP does not believe that there are any impacts of IRP Plans on Aboriginal or treaty rights.

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

### Energy Probe Answer

No. There should be no special treatment for growth-related projects. All projects should be treated equally.

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)?*

### Energy Probe Answer

## Energy Probe Answers to Staff Paper Questions

There should be no adjustment. Rate impact on existing gas ratepayers should continue to be of prime importance.

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 test)? If so, what?*

### Energy Probe Answer

No.

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

### Energy Probe Answer

Energy Probe believes that there is a large overlap between IRP and DSM. The OEB should consider combining them to avoid duplication.

## Energy Probe Answers to Staff Paper Questions