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**BY EMAIL and RESS**

November 19, 2025

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

Dear Mr. Murray:

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**EB-2025-0125 Review and Evaluation of the Integrated Resource Planning Framework  
for Enbridge Gas - Building Owners and Managers Association Toronto (BOMA Toronto)  
Submissions**

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### **Introduction**

In its March 27, 2025 letter, the Ontario Energy Board (OEB) announced that it was launching a consultation to support a review and evaluation of the Integrated Resource Planning (IRP) Framework. The OEB indicated that the review would be informed by challenges and progress in implementing the IRP Framework, an assessment of the impacts to date (including benefits to ratepayers), the IRP Pilot Project application and IRP-related evidence and submissions received during other proceedings. On October 6, 2025, the OEB released a staff discussion paper to support its review of the IRP framework, proposing an incremental evolution of the existing framework, including several proposed changes that are intended to better reflect the general principal that Enbridge Gas should be implementing the solution that is in the best interest of Enbridge Gas and its customers. BOMA Toronto is providing the following responses to the specific questions posed in the discussion paper.

### **BOMA Toronto Submissions**

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?*

As described in the Discussion Paper (Chapter 4), Ontario's Natural Gas Policy Statement in the Integrated Energy Plan (IEP) indicates that "as part of a gradual transition to a more

diverse energy system, 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.....and that there is a need for an economically viable natural gas network."

As such, the IRP Framework needs to support a gradual, cost-effective transition from natural gas to electricity, reducing emission through hybrid electrification, energy efficiency and demand reduction. Customer choice and affordability are vital.

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

BOMA Toronto prefers Option 2: OEB staff files an updated IRP Framework for adjudicative review and approval (generic and not Enbridge-only).

The IRP Framework should be generic (i.e. for both Enbridge and EPCOR), and to be filed by OEB staff (a neutral party would be more appropriate). An adjudicative approach (as opposed to policy guidelines) provides greater authority to set binding requirements on the regulated entities.

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

The updated IRP Framework 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?*

The level of detail in the current IRP Framework strikes an 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?

BOMA Toronto supports the OEB staff proposal for an IRP Implementation Plan. The IRP Implementation Plan should be fully integrated as part of the Distribution System Plan, reviewed as part of the gas distributor's rebasing application.

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?

BOMA Toronto in general agrees with OEB staff's proposed approach.

BOMA Toronto also notes that the Working Group needs to have balanced representation to ensure interests and perspective from all sectors and stakeholders are considered. Commercial buildings can play an important role in reducing peak gas demand in an IRP setting, primarily through ventilation heat recovery, heat recovery chillers and advanced controls, which can also deliver substantial gas volume reductions. BOMA Toronto would be delighted to participate in the IRP working group, providing a voice for commercial property owners throughout the Greater Toronto Area and Ontario.

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?

Innovation should be part of "Good Utility Practice" and there is no need to separately define "innovation-related IRP proposals".

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?*

BOMA Toronto supports the first option, which reflects the current process. This approach enables broader stakeholder input and OEB review through an adjudicated proceeding (which are vital).

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?*

N/A – see our response to Question #7.

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

Yes, electrification should be an eligible IRP Alternative. No cost-effective options should be ruled out.

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. This pilot would provide valuable information. BOMA Toronto further suggests a fully integrated electric and gas IPR pilot where electric and gas distributors work on a joint IRP pilot, which will provide important information and data about the impact of electrification on the electricity distribution and transmission grid.

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)?*

BOMA does not believe there are any legal limitations as the approved funding will be driven by natural gas demand and its rates.

*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?*

A fully integrated electric and gas IPR pilot where electric and gas distributors work on a joint IRP pilot will provide important information and data about the impact of electrification on the electricity distribution and transmission grid.

*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?*

BOMA Toronto does not believe there is a need to increase the current cost threshold.

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

No comments.

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

BOMA Toronto does not support a cost threshold for IRP Alternatives projects. All capital project should be subject to a rigorous IRP Alternatives evaluation.

*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)?*

With the changing environment, cost-effectiveness tests should be part of the process to update the IRP Framework.

*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+)*

See our response to question #17.

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

The cost of the energy transition, to building owners and to the electricity and gas systems, will be eye-wateringly high. A fully integrated and collaborated (including district energy providers, customers, all utilities...) gas and electricity distribution system plan and IRP process that consider all cost-effective alternatives could play an essential role in mitigating those costs.

Commercial buildings can play an important role in reducing peak gas demand in an IRP setting, primarily through ventilation heat recovery, heat recovery chillers and advanced controls, which can also deliver substantial gas volume reductions. Every proposed gas system reinforcement project should assess the potential peak gas demand reduction from commercial buildings served. Advanced gas metering is needed to establish the commercial building demand profiles, quantify the potential peak reduction and verify the actual reduction achieved.

Respectfully submitted on behalf of BOMA Toronto,



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