

November 24, 2025

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

Dear Mr. Murray:

RE: Submissions on Integrated Resource Planning (IRP) Framework Review (EB-2025-0125)

The Electricity Distributors Association (EDA) represents Ontario's local hydro utilities, the part of our electricity system closest to customers. Publicly and privately owned utilities, otherwise known as local distribution companies (LDCs), deliver electricity to residential, commercial, industrial, and institutional customers, powering every community in the province. The sector owns over \$33 billion in electricity system infrastructure and invests more than \$3.1 billion annually in the grid.

Although the EDA has not registered to participate in the IRP Review consultation, we are actively monitoring the proceeding and request that the Ontario Energy Board (OEB) consider our comments. LDCs are affected by several proposals being discussed regarding the review of the IRP Framework. In particular, our members are directly impacted by the OEB staff's proposals to make electrification an eligible IRP alternative and to require Enbridge Gas to consult with affected upstream electricity distributors on whether upgrades to the electricity system are needed to accommodate the increased electrical load resulting from electrification measures.

Additionally, we are concerned about the lack of coordination between the Integrated Energy Plan (IEP) [Implementation Directive to the OEB](#) that focus on the integration of natural gas and electricity planning, such as the gas-electric coordination information sharing forum and coordinated scenario modelling, and the IRP Framework Review.

SUBMISSIONS

The EDA's submission will focus mainly on items noted above regarding electrification and consultation as set out in Chapter 7 of the OEB staff discussion paper.

The OEB staff discussion paper states that it "supports making electrification an eligible IRP Alternative in the updated IRP Framework. OEB staff expects that this will provide more opportunities to enable fuel switching across energy sources when it is cost-effective, consistent with the intent of the IEP."

OEB staff state further that "there may be value in testing the approach of electrification IRP Alternatives as an alternative to new customer connections on a pilot basis first, to gain a better understanding of how this could work in practice (e.g., the willingness and required level of

incentives to builders/developers to consider electrification, timing issues as to when new developments make a determination on their choice of energy sources, etc.).”

Staff also make proposals related to the approach to considering electricity availability issues:

- For IRP Plans that include electrification measures, Enbridge Gas would be required to consult with the impacted upstream providers including distributor(s) and the IESO as to whether electricity system upgrades would be required to accommodate the load, based on the expected electrical peak demand impact and location of the electrification IRP Alternative.
- If a potential electricity system upgrade was identified, the distributor(s) and/or IESO, would be asked to provide approximate estimates of the cost and timing of the upgrade (including the base case as to whether and when an upgrade would be needed in the absence of the electrification IRP Alternative).
- Enbridge Gas could then use this information in further cost-effectiveness testing of the electric IRP Alternative or determine that it does not make sense to pursue the IRP Alternative in this area, given the identified constraints.

The EDA has concerns regarding these proposals. We will address these concerns in response to the OEB’s discussion questions.

OEB Discussion Questions

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?

The EDA submits that the current public policy environment has set out the provincial government’s policy priorities through the IEP. Three of the priorities the province articulated in the IEP to guide future energy planning are of particular relevance to the IRP Framework Review:

- **Develop a single, integrated plan for all energy needs:** Future planning must consider all fuels and technologies together—electricity, natural gas, hydrogen, biofuels, other fuels, and energy storage—to ensure Ontario has the affordable energy it needs to power a clean and growing economy.
- **Coordinate forecasting across energy agencies and utilities:** The IESO, natural gas distributors, electricity utilities, and other market participants will be expected to work together toward using shared, evidence-based forecasts to ensure system-wide alignment across all types of energy use.
- **Ensure regulatory alignment and implementation:** The OEB will continue to play a central role in implementing the plan’s direction through efficient regulation of, and guidance to, the sector.

The EDA understands that the IRP Framework Review was announced before the release of the IEP; however, it would appear that advancing these priorities on regulatory alignment, integrated energy planning, and coordination across agencies and utilities are a pre-condition to making changes to the IRP Framework. As these priorities are advanced, the OEB (and other parties) can begin making more specific changes to other frameworks, in a unified way if needed.

For example, the Minister's IEP implementation directive tasks the OEB with "establish[ing] an ongoing gas-electric coordination information sharing forum in support of integrated energy planning," with the objective to "[s]et the framework for an ongoing forum to facilitate sharing of technical information and data and other coordination to support energy planning processes."

The EDA recommends that the OEB use the IEP directed process to help inform the proposals in the IRP to ensure full consideration from both electric and gas utilities.

The discussion paper states that "any consideration of electrification as an IRP Alternative to connecting new customers would be limited to voluntary measures to preserve customer choice". The discussion paper also states that staff's proposals regarding electrification will "contribute to the IEP's priority of considering all fuels and technologies together in planning to deliver a range of energy system-wide benefits, including enabling fuel-switching when cost-effective and focusing on customers' total energy bills, instead of electricity and other fuel bills separately".

With due respect to these conclusions from the discussion paper, **the EDA believes it is difficult to reconcile how the relatively narrow scope of the IRP framework review aligns with the broad, policy vision of the IEP, especially when the discussion paper states that a general principle of the IRP Framework is that Enbridge pursues solutions "in the best interest of Enbridge Gas and its customers, taking into account reliability and safety, cost-effectiveness, public policy, optimized scoping and risk management" – that is, proposed solutions may not necessarily be in the interests of all energy customers and/or the energy system as a whole.** If OEB staff contend that its proposals satisfy both the IEP priorities and the IRP general principle, the EDA would welcome receiving a more detailed explanation demonstrating how the priorities and principle are achieved.

The EDA suggests that the OEB consider an approach in which the regulatory frameworks of gas (IRP, DSM, gas supply plans) and electricity utilities (NWS, eDSM, DSP) are renewed to better align with the government's ambition to "develop a single, integrated plan for all energy needs."

Moreover, the IEP states that "Ontario's current approach to energy planning has not kept pace with these demands. For too long, decisions about electricity, natural gas, and other fuels have been made separately, without a unified view of how they work together to power the province's economy and communities. This siloed approach, which increased the risk of delays, higher costs, and missed opportunities for coordination, ends with the release of Energy for Generations."

To be clear, the EDA believes that the public policy context (e.g. affordability, economic development, reliability) set out by the provincial government this past summer clearly lays the groundwork for the OEB to initiate a comprehensive process to achieve integrated energy planning. **Continuing to review natural gas planning largely in isolation will only delay the much-needed consideration of joint planning in Ontario's electricity and natural gas sectors (as noted above) and, by extension, the benefits that will flow to the province overall from integrated planning.**

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

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)?

The EDA refers to its previous answer above and further notes that, on March 27, 2025, the OEB issued a notice of review on its own motion to reconsider the Decision and Order in EB-2022-0335. This hearing is currently a live adjudicative proceeding that specifically addresses the use of electricity-based IRP Alternatives, including the potential costs of any required electricity system upgrades. The outcome of the proceeding is therefore directly related to some of the proposals in the OEB staff discussion paper.

The EDA submits that this creates the potential for conflict between staff's current proposals regarding electrification and the future decision of OEB Commissioners on the review motion, which suggests that **the IRP Framework review should wait for the outcome of the adjudicative proceeding before expanding electrification beyond current pilots.**

Moreover, the EDA submits that the electrification proposals being made by OEB staff appear to delegate Enbridge Gas as the entity with primary responsibility for making decisions related to the cost-effectiveness between traditional natural gas investments and electrification.¹

The EDA has concerns with this approach and would welcome clarification by OEB staff on how decisions regarding electrification (whether for existing customers or new customer connections) should be made and by whom. For example, we question whether it is the OEB's view that LDCs cannot proactively identify opportunities for electrification based on customer and/or community preferences (e.g., municipal bylaws related to meeting a municipality's climate and sustainability targets) and must instead rely on Enbridge to identify potential opportunities.

The EDA suggests that this is an important topic that would best be addressed as part of the gas-electric coordination information-sharing forum, in support of integrated energy planning, which the OEB has been directed to establish by the IEP directive.

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)?

The discussion paper states “[i]n the original IRP Framework proceeding, some parties expressing concerns around electrification IRP Alternatives argued that these activities may fall outside of the OEB's authority to set rates for the sale of gas or the transmission, distribution, and storage of gas under section 36 of the *OEB Act*, particularly if they involved avoiding the connection of new natural gas customers. The OEB did not directly address this issue in its decision.”

¹ Similar concerns were raised at the July 30, 2025 IRP Working Group Meeting. For example, meeting notes state the following: “A WG member noted a general opposition to Enbridge having responsibility for electrification, and did not believe that Enbridge should be the gatekeeper for incentivizing electrification, given the conflict of interest; and, “The WG member proposes an approach to electrification where the IESO or the local electric utility would have be [sic] in charge of meeting energy demand through electrification (which could include them providing incentives for electrification), and only if the IESO/electric utility confirmed that the energy need could not be fully met with electrical options could Enbridge proceed with a facility project (or other potential non-electric IRPAs).” See: <https://engagewithus.oeb.ca/28744/widgets/145694/documents/157566>

However, the discussion paper itself does not discuss this issue further aside from the reference above. As a result, it is not clear what view OEB staff (or OEB Commissioners) hold on this matter (i.e., whether or not the activities fall outside the OEB's authority under section 36).

The EDA does not currently have a specific view on this issue but believes it should be resolved before deciding whether electrification (and other alternatives, such as district energy) should be included as an eligible IRP Alternative.

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?

The EDA refers to its answers above and further submits that clarity is needed on how (and when) costs and rate impacts stemming from any potential Enbridge electrification programs that trigger LDC planning and electricity system upgrades will be assessed, allocated, and recovered. For example, we question whether the OEB will require LDCs to make any upgrades to meet Enbridge's timelines, and whether LDCs would be required to demonstrate prudence if investments are being made to further Enbridge goals.

The EDA recommends that the OEB set out requirements for how Enbridge should incorporate such costs into its IRP analysis, ensuring they are applied in a rigorous, consistent, and transparent manner.

We respectfully request that the OEB consider the EDA's comments in its review of the IRP Framework. If you have any questions, please do not hesitate to contact Rudra Mukherji, Senior Regulatory Affairs Advisor, at rmukherji@eda-on.ca.

Sincerely,



Ted Wigdor
Vice President, Policy, Government & Corporate Affairs