

December 17, 2025

Staff Discussion Paper

Gas-Electric Co-ordination Information Sharing

EB-2025-0227



Table of Contents

1.	Executive summary	
	1.1 Purpose	3
	1.2 Context	3
	1.3 Next steps	
2.	Introduction	5
3.	OEB's plan to meet its Implementation Directive requirements	7
4.	Energy planning in Ontario	Q
→.	4.1 Introduction	
	4.2 Energy planning processes	
	4.3 Application of planning	
	4.4 Co-ordinated planning	
5.	Guiding principles for gas-electric information sharing	12
6.	OEB's approach for facilitating gas-electric information sharing and co-ordination	
	6.1 Co-ordination forum	
	6.2 Discussion questions	14
7.	OEB's proposals for information sharing	15
	7.1 Introduction	
	7.2 Outcomes and objectives: What feedback do you have on the OEB's proposed outcomes	and
	objectives for gas-electric information sharing and co-ordination?	15
	7.3 Information sharing: How should planning information be shared, stored and accessed?	
	7.4 Information type: What gas and electricity planning information should be shared?	19
	7.5 Data comparability: How should planning data be converted for comparability?	22
	7.6 Information discussion : How should planning information be discussed among utilities,	
	Indigenous communities and other participants?	22
	7.7 Information application : How should the shared planning information be used?	24
8.	Conclusion	26
9.	Appendix 1: Electricity planning in Ontario	27
	9.1 Overview	
	9.2 Bulk planning	27
	9.3 Regional planning	27
	9.4 Distribution system planning	28
10.	Appendix 2: Natural gas planning in Ontario	29
	10.1 Overview	
	10.2 Gas Supply Plan	
	10.3 Asset Management Plan	
	10.4 Integrated Resource Planning (IRP)	
11.	Appendix 3: Possible extent of co-ordination	32
	11.1 Spectrum of approaches for co-ordinated planning	
	11.2 Jurisdictional scan	
12.	Appendix 4: Considerations of co-ordinated planning in Ontario	36
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1. Executive summary

1.1 Purpose

The Minister of Energy and Mines issued an Implementation Directive to the Ontario Energy Board (OEB) regarding the implementation of Ontario's Integrated Energy Plan, *Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7*. The Directive requires the OEB to establish a gas-electric co-ordination information sharing forum (hereby "co-ordination forum") by January 31, 2026. The OEB must report to the Minister on progress by September 30, 2026. This initiative will result in a framework to facilitate gas-electric information sharing.

This discussion paper invites written feedback from stakeholders¹ and Indigenous communities on the design of a gas-electric information sharing framework. It also outlines the OEB's plans to establish a co-ordination forum to discuss participants' perspectives on the framework's design.

1.2 Context

Electricity and natural gas utilities each develop discrete system plans, which include information such as demand forecasts and solutions for meeting anticipated demand. These plans are filed as evidence to support applications to the OEB for the approval of proposed system upgrades and expansions, proposed changes to rates and other approvals. The OEB considers these plans in its decision-making to better understand the rationale for utilities' proposed investments and rate proposals. Electricity and natural gas planning, however, have largely occurred in isolation from each other.

Through this initiative, gas-electric co-ordination and information sharing will support energy planning by strengthening forecasting transparency, accuracy and responsiveness to growth and electrification. As a result, decision-making will also become better informed as it relates to energy system buildout and investments. These improvements help address risks such as overbuilding energy systems, which could strand assets and increase costs for ratepayers, and underbuilding, which impedes economic growth and energy reliability.

1.3 Next steps

The OEB will initiate a co-ordination forum in January 2026 to discuss the following questions:

1. Current state: What are your views on the successes and limitations of existing gas-electric information sharing and co-ordination?

Page 3

¹ The OEB seeks feedback from stakeholders, including gas distributors, electricity distributors and transmitters, the Independent Electricity System Operator (IESO), urban and transport planners and representatives of other relevant interests such as ratepayers. Stakeholders and Indigenous communities interested in providing written feedback to this discussion paper and participating in the co-ordination forum should register for this initiative's consultation, here.

- Outcomes and objectives: What feedback do you have on the OEB's proposed outcomes and objectives for gas-electric information sharing and co-ordination?
- 3. Information sharing: How should planning information be shared, stored and accessed?
- 4. **Information type**: What gas and electricity planning information should be shared?
- 5. Data comparability: How should planning data be converted for comparability?
- 6. **Information discussion**: How should planning information be discussed among utilities, Indigenous communities and other participants?
- 7. **Information application**: How should the shared planning information be used?
- 8. **Roles**: What should be the roles and responsibilities of the OEB, utilities, the Independent Electricity System Operator (IESO), Indigenous communities and other participants in the sharing, discussion and application of planning information?
- 9. **Timing**: When should planning information be shared, discussed and applied, and how often?
- 10. **Other issues**: What other issues should the OEB consider, including issues related to the OEB's medium-term objective of setting expectations to establish consistent planning assumptions and scenarios?

Utilities (i.e., electricity distributors and transmitters and gas distributors) and the IESO are required to participate in this forum. Municipalities, urban and transportation planners, Indigenous communities and representatives of other relevant interests such as ratepayers are encouraged to participate. For clarity, the forum's purpose is to gather feedback on a framework for gas-electric information sharing – not to share the information itself. The OEB is also seeking written feedback from the aforementioned participants on these questions by February 16, 2026.

Written feedback and forum discussions will inform the OEB's September 2026 report to the Minister. It will also inform the OEB's development of a framework to facilitate gas-electric information sharing and co-ordination. Natural gas and electricity utilities and the IESO will share information with each other based on this framework. Municipalities, urban and transportation planners and Indigenous communities will be encouraged to participate in information sharing.

2. Introduction

The Ontario government published its Integrated Energy Plan, <u>Energy for Generations:</u> <u>Ontario's Integrated Plan to Power the Strongest Economy in the G7</u>, on June 12, 2025. It emphasizes the goals of maintaining an affordable, secure, reliable and clean energy system that meets growing demand and powers a more competitive economy.

The Integrated Energy Plan identifies natural gas and electricity co-ordination as a priority for achieving its goals. The outcomes of natural gas and electricity co-ordination could include:

- Avoiding risks of higher costs due to overbuilding or underbuilding of energy infrastructure.
- Strengthening energy planning to be more responsive to a faster pace of growth.
- Enabling fuel-switching when cost-effective.
- Reducing the risks of energy shortages and associated loss of economic opportunities.

In his <u>Implementation Directive</u> to the OEB, the Minister of Energy and Mines outlined the OEB's role in implementing the Integrated Energy Plan. Section 1 of the Directive requires the OEB to establish a co-ordination forum.

Figure 1: Section 1 of the OEB's Implementation Directive requiring the OEB to establish an information sharing forum

With respect to the Government of Ontario's objective of planning for growth and electrification, the OEB shall:

- 1. Take the following steps to establish an ongoing gas-electric coordination information sharing forum in support of integrated energy planning:
 - 1.1. Set the framework for an ongoing forum to facilitate sharing of technical information and data and other co-ordination to support energy planning processes.
 - Through this forum, the OEB shall set expectations for information sharing, including supporting information sharing in the short-term and establishing the use of consistent assumptions and scenarios in the medium-term.
 - The OEB shall encourage and, where the OEB deems appropriate, require key energy planners and energy-related planners at the local, regional and bulk level to participate in the forum. Key energy planners and energy-related planners include the IESO, electricity and natural gas transmitters and distributors, municipalities, Indigenous communities, transportation planners and urban planners.
 - For information shared by the forum, the OEB, in consultation with energy and energy related planners, shall establish a clear approach for transferring and accessing data. This could include general best practices for file formats; procedures; consideration of confidentiality, for example clarifying what information should be shared with which entities and whether information should be public or non-disclosure agreements are needed; and potentially working towards harmonization of software.

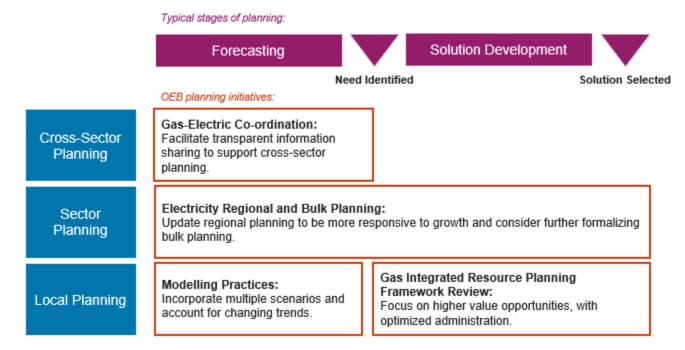
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- 1.2. Initiate the forum no later than January 31, 2026 and report back on the progress, outcomes and modelling best practices of the information sharing forum by September 30, 2026.
- The subsequent frequency, format and parameters of meetings shall be set by the OEB given the diverse planning needs of the participants. Further expectations on reporting will be communicated through future Letters of Direction, as needed.
- For clarity, meetings of the forum or its subcommittees may satisfy other stakeholder engagement requirements, where the OEB deems appropriate.

This discussion paper outlines the OEB's approach to implementing Section 1 of the Directive and invites stakeholders' feedback on the OEB's proposals.

The OEB and IESO are concurrently implementing other initiatives related to energy planning in response to other Implementation Directive requirements (see Figure 2).

Figure 2: OEB initiatives related to energy planning



The OEB's proposals align with these parallel initiatives, where appropriate. These linkages are summarized in Table 1, below, and described in greater detail in Section 7.

Table 1: Summary of Linkages to Other OEB Initiatives

Other OEB Directive Initiatives	Alignment with Gas-Electric Co-ordination Information Sharing Project	
Ensure additional scenarios and assumptions are incorporated in energy forecasting.	Gas-electric information sharing would be expected to include these scenarios and assumptions, enabling updates to ensure accuracy through cross-checking.	
Require electricity distributors to provide their latest forecasts and other information as part of electricity regional planning.	Electricity distributors could share their latest forecasts and other information with each other through the gas-electric co-ordination information sharing project.	
Ensure gas distributors participate in electricity planning, including through information sharing.	Gas distributors would participate in electricity planning, in part, by exchanging planning data with electricity utilities through the gas-electric coordination information sharing project.	

3. OEB's plan to meet its Implementation Directive requirements

The OEB plans to undertake the following activities to meet Section 1 of the Directive.

Table 2: Implementation of Section 1 of OEB Directive

Type of Activity	Description
Consultation on designing a gas-	Launched a consultation on December 5, 2025. The Consultation Launch Letter is available here .
sharing framework	Published this discussion paper on December 17, 2025.
	Initiate the co-ordination forum by convening the first forum meeting in January 2026.
	The forum will be a series of OEB-led meetings throughout the first half of 2026 to advise the OEB on setting expectations for gas-electric information sharing.
	Receive written feedback from stakeholders and Indigenous communities on this discussion paper by February 16, 2026.

	Convene additional co-ordination forum meetings between March and September 2026 to discuss designing the framework for gas-electric information sharing, including feedback received on the discussion paper.
Report to Minister	Report to the Minister of Energy and Mines by September 30, 2026, on the progress, outcomes and modelling best practices of the forum.
Finalize framework	Finalize requirements for information sharing by late 2026. These requirements will be informed by feedback received from the coordination forum and written feedback on this discussion paper.
Implement framework	Gas and electricity utilities, the IESO and other relevant entities will begin ongoing information sharing in late 2026 or early 2027.
Consultation on establishing consistent assumptions and scenarios	Section 1 of the Directive also requires the OEB to establish the use of consistent assumptions and scenarios in the medium term. The OEB plans to engage the co-ordination forum in 2026 to discuss its approach for achieving this requirement.

4. Energy planning in Ontario

4.1 Introduction

The OEB Directive states gas-electric information sharing and co-ordination should support energy planning processes. This section introduces electricity planning, gas planning and co-ordinated planning in Ontario.

4.2 Energy planning processes

Electricity and natural gas entities conduct energy planning. Energy plans typically include information on demand and customer forecasts. They also include solutions for meeting anticipated demand, including non-traditional alternatives such as non-wires/non-pipes solutions, considerations of conservation and public policy and approaches to asset management, among other considerations. These solutions inform utilities' investment proposals.

Electricity planning in Ontario occurs at three levels: bulk, regional and distribution. Electricity bulk planning is led by the IESO, regional planning is led by the IESO and a designated lead transmitter in each of 21 regions, and distribution system planning is carried out by each electricity distributor. The OEB sets requirements for regional and distribution system planning. The bulk, regional and distribution electricity planning processes are described in detail in Appendix 1.

Gas planning is conducted by Ontario's two rate-regulated natural gas distributors, Enbridge Gas and EPCOR Natural Gas Limited Partnership (EPCOR), based on requirements set by the OEB. Enbridge Gas serves the large majority of gas customers in Ontario. It prepares gas supply plans and utility system plans that include asset management and integrated resource planning. EPCOR produces asset management and gas supply plans for its service areas. Gas planning is based on a distributor's service area and not conducted through bulk-, regional- and distribution-level planning processes like in electricity planning. Natural gas planning processes are described in detail in Appendix 2.

Natural gas and electricity utilities engage with non-utility stakeholders to inform their planning. For example, electricity distributors must demonstrate in their rate applications that they have co-ordinated system planning with customers, including large customers and municipalities. Consultations may also occur with Indigenous communities where there may be impacts to Aboriginal or treaty rights. Stakeholders and Indigenous representatives may also apply to be an intervenor in gas or electricity hearings before the OEB, including leave to construct applications, where this planning (or the outcomes of this planning) is at issue.

4.3 Application of planning

Energy plans include:

- Electricity Distribution System Plans
- Electricity Transmission System Plans
- Electricity Regional Infrastructure Plans
- Electricity Integrated Regional Resource Plans
- Electricity Bulk System Planning Reports
- Gas Integrated Resource Planning Plans (IRPs)
- Gas Supply Plans and
- Gas Asset Management Plans

The OEB has established some requirements and guidance for planning, such as filing requirements for electricity and natural gas rate applications, to ensure the consistency, completeness and rigour of electricity and natural gas plans. These plans inform utilities' system expansions and maintenance decisions. These plans are also filed as evidence to support utilities' applications to the OEB, such as leave to construct and rate applications, helping demonstrate why proposed investments are necessary and prudent. The OEB reviews elements of electricity and natural gas plans through various applications, such as rates proceedings and leave to construct proceedings, to better understand the rationale, assess the prudence and assess the rate consequences,

among other objectives, of utilities' proposed investments. Utility plans and investment proposals can ultimately affect customer bills.

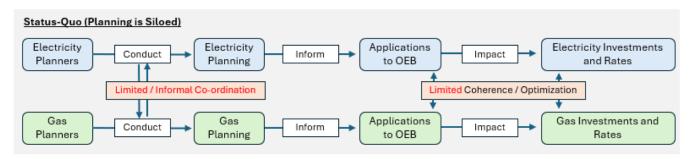
4.4 Co-ordinated planning

There is already some measure of co-ordination in planning within the electricity sector, and within the natural gas sector. For example:

- Electricity utilities and the IESO co-ordinate with each other to ensure there is sufficient electricity supply and infrastructure to meet demand.
- Electricity utilities and the IESO co-ordinate with each other through the regional planning process to ensure that distribution and regional needs are addressed efficiently.
- Enbridge Gas serves the large majority of natural gas customers in Ontario and develops a gas supply plan, IRP and Asset Management Plan for its service area, which covers most of the province. As a result, investments are largely integrated across Ontario's natural gas system.

Electricity and natural gas planning, however, have generally occurred in isolation from each other.

Figure 3: Existing Planning Processes are Siloed



A siloed approach in planning has some advantages. For example, electricity and natural gas planning have different goals and time frames and are required to address different risks and require different skill sets and analyses.

However, there are increasing interplays between electricity and natural gas – for example, related to gas to electricity fuel-switching and other sector trends. Gas-electric co-ordination would ensure that utilities and other relevant stakeholders and Indigenous communities are better informed in addressing these interplays.

There are various degrees of gas-electric planning co-ordination (see Appendix 3), which differ in complexity, comprehensiveness and potential impact. At its initial levels, co-ordination may involve ad hoc communications or structured information sharing between entities. More advanced co-ordination may involve using common forecasting inputs or results. At the highest level, it may involve fully aligning business strategies

and investment decisions. This project seeks to facilitate information sharing in the short term, and the use of consistent assumptions and scenarios in the medium term.

Objectives of gas-electric information sharing that are achievable in the short term include:

- Improved transparency of planning information, enabling a more informed and comprehensive consideration of energy needs and utilities' operating environments.
- Greater planning data comparability, supporting the identification and addressing of synergies, constraints and redundancies between the electricity and natural gas sectors.
- Enhanced dialogue among planning entities, helping them address planning inconsistencies such as underinformed or misaligned assumptions and scenarios.
- Strengthen the quality and comprehensiveness of evidence in applications to the OEB, enabling more informed regulatory reviews and decisions in adjudication, including an improved understanding of discrepancies between utilities' forecasts and their associated risks.

Achieving these objectives would contribute to the desired outcomes of co-ordinated planning outlined in the Integrated Energy Plan, such as avoiding overbuilding or underbuilding gas or electricity infrastructure. Gas-electric information sharing will also help the OEB understand the nature of similarities and inconsistencies between gas and electricity planning assumptions and scenarios. This will inform the OEB's approach for setting expectations for establishing consistent planning assumptions and scenarios in the medium term.

A lack of co-ordination in energy planning could negatively impact Ontario's energy consumers, resulting in potentially higher energy prices, stranded asset risks and impeding the province's efforts in meeting future energy needs.

The OEB recognizes that some co-ordination has occurred between gas and electricity planning in recent years, however, it has primarily been informal, ad hoc or limited in scope. For example, Enbridge Gas has participated in a small number of electricity regional planning processes (e.g., Windsor-Essex's regional planning in 2019 and Ottawa's regional planning in 2021) by observing the processes, reviewing select materials and providing information and feedback. Formally structured and consistent co-ordination between natural gas and electricity planning has not occurred. Additional examples related to co-ordinated planning in Ontario are listed in Appendix 4.

The OEB also acknowledges interest expressed by stakeholders in co-ordinated planning in recent years. For example:

- In 2021, the Regional Planning Process Advisory Group, whose membership included utilities, customer representatives and energy associations, delivered a report (Page 6) to the OEB that recommended, among other matters, enhancing co-ordination among electricity, natural gas and municipal planning processes. The report recommended that enhanced co-ordination could help avoid planning duplication and unintended consequences between the two systems. It also provided guidance to electricity sector entities on forecasting co-ordination, collaboration with municipalities, and stakeholder consultations.
- In its <u>2024 rebasing application</u> (Exhibit 1, Tab 10, Schedule 6, Page 29-30 of 40), Enbridge Gas said it believes energy system planning in Ontario can be done in a more co-ordinated manner and that "integrating gas and electric system planning would enable optimized pathway modeling for Ontario and by region, ensuring that the most cost effective, safe, reliable, and resilient transition is planned for and implemented." Enbridge Gas also stated that "the integration of gas and electric system planning supports the maintenance of the gas system amidst uncertainty, as it ensures that the same need is not forecasted or planned for by both sectors."
- The 2024 report of the <u>Electrification and Energy Transition Panel</u> (Page 95) stated natural gas and electric systems are currently planned and regulated separately. The report recommended that the OEB support greater co-ordination between the electricity and natural gas sectors. The report also recommended that co-ordination should focus on, among other matters, an aligned vision, shared forecasting to understand the effects of fuel-switching and the pursuit of opportunities for system optimization.

5. Guiding principles for gas-electric information sharing

The OEB will have regard to its statutory objectives in developing an approach for gaselectric information sharing and co-ordination. The OEB will also be guided by the following principles:

- Collaborative by engaging with stakeholders and Indigenous communities, including the IESO and electricity and natural gas utilities, within which planning expertise resides.
- **Transparent** in its process, objectives and outcomes to ensure that stakeholders and Indigenous communities have the information required to meaningfully participate in the co-ordinated planning processes.
- Flexible and iterative in its approach to improve and adapt to evolving needs, opportunities and challenges.

- Relevant to the mandate of the OEB and the objectives of co-ordinated planning, by focusing on matters that materially impact energy planning, utilities' investments and consumers.
- **Informed** by existing planning processes, including leveraging existing resources to minimize new planning burdens, where possible.
- **Forward-thinking** by considering the impact and evolution of co-ordinated planning over the span of decades, rather than just in the near term.
- Accountable by providing clear delineations of roles and responsibilities among all co-ordinated planning participants, and by reporting on progress to the Minister of Energy and Mines by September 30, 2026.
- **Policy responsive** by ensuring consistency with Government of Ontario policies and goals, such as the vision for an affordable, reliable, secure and clean energy future outlined in the Integrated Energy Plan, where applicable.

6. OEB's approach for facilitating gas-electric information sharing and co-ordination

6.1 Co-ordination forum

The OEB will launch a gas-electric information sharing co-ordination forum (hereby "co-ordination forum") in January 2026 that will involve a series of OEB-led meetings. This will meet the OEB Directive's requirement to initiate a forum by January 31, 2026. Utilities and the IESO are required to participate in this forum. Municipalities, urban and transportation planners, Indigenous communities and representatives of other relevant interests such as ratepayers will be encouraged to participate.

The purpose of the co-ordination forum will be to provide feedback to the OEB on the development of a framework to facilitate the ongoing sharing of gas-electric technical information and data and other co-ordination to support energy planning processes. For clarity, the co-ordination forum itself will not be a venue for sharing gas-electric technical information – this will happen after, potentially later in 2026. Rather, the co-ordination forum will focus on advising the OEB on how a framework for gas-electric information sharing should be designed and implemented.

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Anticipated co-ordination forum meeting dates include:

- 1. January 27, 2026 (confirmed)
- 2. March 2026 (specific date to be determined)
- 3. April 2026 (specific date to be determined)
- 4. May 2026 (specific date to be determined)

The OEB will share Terms of Reference with participants ahead of the first meeting. Additional meetings may be scheduled and planned meetings may be cancelled or rescheduled based on need.

Even after the OEB finalizes a framework for sharing gas-electric planning information, the OEB may convene co-ordination forum meetings on an ad hoc basis to discuss updates and other issues. For example, additional co-ordination forum meetings may be convened to discuss updates to the scope of information sharing or to advise on setting expectations for establishing the use of consistent gas-electric planning assumptions and scenarios.

6.2 Discussion questions

The OEB is seeking written feedback from stakeholders and Indigenous communities on the following questions by February 16, 2026. Written feedback will be discussed in the co-ordination forum, during which forum participants will have additional opportunities to express their views.

- 1. **Current state**: What are your views on the successes and limitations of existing gas-electric information sharing and co-ordination?
- 2. **Outcomes and objectives**: What feedback do you have on the OEB's proposed outcomes and objectives for gas-electric information sharing and co-ordination?
- 3. **Information sharing**: How should planning information be shared, stored and accessed?
- 4. **Information type**: What gas and electricity planning information should be shared?
- 5. Data comparability: How should planning data be converted for comparability?
- 6. **Information discussion**: How should planning information be discussed among utilities, Indigenous communities and other participants?
- 7. **Information application**: How should the shared planning information be used?
- 8. **Roles**: What should be the roles and responsibilities of the OEB, utilities, the IESO, Indigenous communities and other participants in the sharing, discussion and application of planning information?

- 9. **Timing**: When should planning information be shared, discussed and applied, and how often?
- 10. **Other issues**: What other issues should the OEB consider, including issues related to the OEB's medium-term objective of setting expectations to establish consistent planning assumptions and scenarios?

7. OEB's proposals for information sharing

7.1 Introduction

The OEB's views on the status of gas-electric information sharing and co-ordination (i.e., question 1) were outlined in the previous sections of this paper and its proposal to support improvements is presented below.

The OEB's initial perspectives and proposals related to questions 2 through 7 are outlined below. Its views on questions 8 and 9 are addressed within the context of questions 2 to 7, where roles, responsibilities and timing considerations are most relevant. The OEB is providing its initial perspectives, proposals and options to facilitate discussion and provide a basis for feedback. The OEB's development of a framework to facilitate gas-electric information sharing will be informed by the feedback received from stakeholders and Indigenous communities.

As mentioned in Section 2, the OEB's proposals aim to align with other OEB and IESO energy planning initiatives. Initiatives with potential linkages to the OEB's proposals are described in Figures 4 to 7 throughout the OEB's proposals below.

The OEB also recommends that the scope and process for information sharing begin in a limited way to enable near-term implementation. Over time, the approach to information sharing may evolve to become broader in scope as the OEB, utilities, Indigenous communities and other relevant stakeholders gain experience in gas-electric co-ordination.

7.2 **Outcomes and objectives**: What feedback do you have on the OEB's proposed outcomes and objectives for gas-electric information sharing and co-ordination?

The OEB's immediate goal is to facilitate gas-electric information sharing and coordination. The OEB's proposed objectives for this are:

 Improved transparency of planning information, enabling a more informed and comprehensive consideration of energy needs and utilities' operating environments.

- Greater planning data comparability, supporting the identification and addressing of synergies, constraints and redundancies between the electricity and natural gas sectors.
- Enhanced dialogue among planning entities, helping them address planning inconsistencies such as underinformed or misaligned assumptions and scenarios.
- Strengthen the quality and comprehensiveness of evidence in applications to the OEB, enabling more informed regulatory reviews and decisions in adjudication, including an improved understanding of discrepancies between utilities' forecasts and their associated risks.

The OEB expects that achieving these objectives would contribute to the ultimate outcome of rightsizing the buildout of energy systems.

The OEB expects to finalize requirements for information sharing by late 2026, with gaselectric information sharing beginning thereafter based on these requirements. The OEB plans to engage the co-ordination forum in 2026 to discuss its approach for establishing the use of consistent assumptions and scenarios, which is another requirement of the OEB Directive. Consistency in assumptions and scenarios will help further optimize the buildout of energy systems.

It would be beneficial to implement gas-electric information sharing before requiring the use of consistent assumptions and scenarios. The co-ordination forum and near-term information sharing will help identify the most relevant and impactful assumptions and scenarios in gas and electricity planning, which are indicative of the areas where consistency is most needed. Additionally, information sharing will help the OEB understand the nature and causes of inconsistencies as it relates to planning assumptions and scenarios. These insights will inform the OEB's plan for requiring consistent assumptions and scenarios, which the OEB's September 2026 report to the Minister will provide more information on.

The OEB welcomes feedback on the short-term outcomes and objectives of gas-electric information sharing and co-ordination, and how they may evolve over time. The OEB is also seeking input on steps it can take to ensure its approach remains effective and adaptable as planning needs and co-ordination outcomes and objectives continue to develop, including as it relates to the future use of consistent assumptions and scenarios.

7.3 **Information sharing**: How should planning information be shared, stored and accessed?

The OEB proposes the following approach (see Table 3) to facilitate information sharing.

Table 3: Proposed Characteristics of Data Repository

Characteristic	Proposal
Central storage	An online data repository could be established to facilitate the sharing, storage and access of planning information.
Host	The OEB seeks feedback on whether the OEB or another organization could establish and maintain an online data repository.
Data contributors	Utilities ² and the IESO could be required to provide entries to the data repository. Municipalities, urban and transportation planners and Indigenous communities could also be encouraged to participate and provide data entries.
Format of entries	Entries could follow a format defined by the OEB (e.g., Excel templates) to ensure consistency. Commentary may also be submitted alongside data.
Access	The OEB seeks feedback on whether entries to the data repository should be made publicly accessible and concerns related to confidentiality.
Data Governance	Participants would be accountable for the quality and compliance of their own entries. The OEB could monitor entries by utilities and the IESO to ensure completeness.
Timing of entries	At minimum, entries could be provided annually, 30-90 days before each annual electricity Technical Working Group (TWG) meeting (see below).

In terms of the timing of entries to the repository, Section 4.2 of both the IESO and OEB Directives require electricity regional planning TWG meetings to occur annually and for electricity utilities to share their forecasts each time the TWG meets (see Figure 4, below).

Figure 4: Paraphrasing of Implementation Directive items

- s. 4.2 of the IESO Directive says the IESO shall formalize the practice of convening TWG meetings at least once a year.
- s. 4.2 of the OEB Directive says the OEB shall require electricity distributors to provide their latest demand forecasts and any information pertaining to new demand growth to support regional planning each time the TWG meets.

² "Utilities" in the OEB's proposal refers to gas distributors and electricity distributors and transmitters.

Electricity and gas utilities, the IESO and other relevant participants operating within the boundaries of an electricity planning region could provide planning information relevant to that region to the data repository. Entries to the data repository could occur 30 to 90 days prior to that region's annual TWG meeting. For example, 30-90 days before the Ottawa region's annual TWG meeting, utilities operating in this region, the IESO and other participants could submit their planning information related to the Ottawa region to the data repository. Updated entries could be provided more regularly as needed, at the discretion of participants.

Utilities, the IESO and other participants would be expected to provide their latest and best information. Some information is not updated annually, therefore, the same information may be provided each year, where appropriate. Entries could begin after the OEB finalizes a framework for information sharing, which the OEB is aiming to complete in late 2026.

Entries to the data repository would meet s. 4.2 of the OEB Directive, which requires electricity distributors to provide their latest forecasts to the TWG each time it meets, depending on the nature of these entries.

The OEB has considered alternative options for information sharing. For example, utilities and other participants could provide their planning information directly to each other, which could enhance flexibility and reduce the burden of maintaining a data repository. This option would still require a systematic process for information sharing that involves non-utility participants and the OEB.

Table 4: Proposed Characteristics of Direct Information Sharing

Characteristic	Alternative Proposal
Host	Utilities and the IESO would be responsible for developing a process to facilitate information sharing, including for non-utility participants.
Data contributors	Utilities and the IESO could be required to share data. Municipalities, urban and transportation planners and Indigenous communities could be encouraged to share data.
Format	Information sharing could follow a format endorsed by the OEB (e.g., Excel templates) to ensure consistency. Commentary may also be submitted alongside data.
Data Governance	Participants would be accountable for the quality and compliance of the data they share with others. The OEB could ensure that utilities and the IESO adhere with completeness expectations.
Access	Utilities and the IESO would be responsible for ensuring ongoing access to the shared information, including for the OEB and non-utility participants. The OEB seeks feedback on whether the shared information should be made publicly accessible and concerns related to confidentiality.
Timing	At minimum, information should be shared annually, 30-90 days before each annual electricity TWG meeting.

7.4 **Information type**: What gas and electricity planning information should be shared?

Gas-electric co-ordination and information sharing should support outcomes including rightsizing energy system buildout. The OEB believes that the information shared could contribute to this outcome if it meets the following criteria:

- Relevance to the outcomes of both gas and electricity planning
- Usefulness in enhancing planning accuracy
- Usefulness to stakeholders, including intervenors, and Indigenous communities in reviewing energy plans and applications submitted to the OEB
- Usefulness to OEB commissioners in supporting their decision-making

Section 2 of the OEB Directive (Figure 5, below) requires gas and electricity planning frameworks and processes to incorporate a list of new scenarios and assumptions.

Figure 5: Paraphrasing of Implementation Directive items

- s. 2.1 of the OEB Directive says the OEB shall ensure that gas and electricity distributors incorporate reference, low and high demand scenarios for their planning frameworks as processes. These scenarios should consider electrification of transportation, industry and other areas that impact electricity and natural gas.
- s. 2.2 of the OEB Directive says the OEB shall ensure that gas and electricity distributors incorporate or consider the following in their planning or modelling frameworks and processes:
 - Economic growth, employment, population and housing projections.
 - Cost projections for future investments that reflect reasonable assumptions for cost trends.
 - Frequent and extreme weather impacts on energy infrastructure resilience.
 - Average, minimum and maximum temperatures.
 - Fuel-switching costs and benefits.

The gas and electricity planning data that should be shared would be expected to include, at minimum, these scenarios and assumptions, because they are readily available and required to be considered in distributors' forecasting as part of the implementation of Section 2 of the OEB Directive. This will enable planning entities to update their data for accuracy through cross-checking with others and better understanding how electrification and fuel switching may affect the gas and electricity sectors. The OEB will seek the co-ordination forum's input on how this information should be presented (e.g., format, granularity, time frame, etc.).

The granularity of planning data shared should strike a balance between being meaningfully comparable and not overly detailed to avoid placing undue burden on utilities and other participants generating and sharing these data. Therefore, the OEB proposes that the geographic scope of data shared should be at the distribution or

regional level using the existing 21 electricity regional planning boundaries³. Each utility would share data specific to its own service area within a region and would not be expected to provide information for areas outside its jurisdiction.

Some utilities operate across multiple regions, such as Enbridge Gas and Hydro One. The OEB seeks feedback on whether these utilities may need to translate their provincewide or multi-region assumptions and forecasts into region-specific estimates before providing them to the data repository. This translation would be beneficial because assumptions and forecasts broader than the regional level (e.g., multi-region or provincial level) would have limited comparability and relevance to distributors that plan at the distribution level. Most distributors do not operate across multiple regions and would therefore not be required to translate their assumptions and forecasts.

Table 5, below, provides examples of types of data that could be shared. The OEB welcomes feedback on the usefulness and impact of sharing these types of data.

Table 5: Examples	-f:-f	46-4- :4- 46	- Data Danasitani
Table 5' Examples	ot intormation	io snare in in	e Data Repository

Туре	Unit	Geography	Granularity	Time period	Time frame	
Demand	MW, MWh, m ³	Distribution or Regional	welcomes welcomes feedback	r Regional welcomes	welcomes	The OEB welcomes feedback
New committed customer load forecast	MW, MWh, m ³			on the time period (e.g. annual, monthly, daily, hourly)	on the time frame (e.g. past 5	
Non-committed customer load forecast	MW, MWh, m ³				years, future 5,10, 20 years) that is	
Non-committed customer load forecast for growth sectors (e.g. mining, greenhouses, data centres)	MW, MWh, m ³	available and most helpful for information		readily available and most helpful for information sharing.		

Page 20

³ The 21 electricity planning regions are: 1) Burlington to Nanticoke, 2) Toronto Area, 3) Windsor-Essex, 4) Greater Toronto Area North, 5) Greater Ottawa, 6) Kitchener-Waterloo-Cambridge-Guelph, 7) Greater Toronto Area West, 8) Greater Bruce/Huron, 9) East Lake Superior, 10) Greater Toronto Area East, 11) Peterborough to Kingston, 12) South Georgian Bay/Muskoka, 13) London Area, 14) Sudbury/Algoma, 15) Northwest Ontario, 16) Chatham/Lambton/Sarnia, 17) Niagara, 18) North/East of Sudbury, 19) Renfrew, 20) St. Lawrence, and 21) North of Moosonee.

Ontario Energy Board | Gas-Electric Co-ordination Information Sharing

Electric Vehicles	MW, MWh, number of vehicles			information sharing.	
Electrified Heating	%, MW, MWh, m³ change				
Heat pump efficiency	% or co- efficient of performance				
Conservation and Demand Management/ Demand Side Management	MW, MWh, m ³				
Weather	Heating and cooling degree days High/low temperature		Peak (Summer and Winter)		
GDP change	%		Total		
Population change	# or %		Total		
Customer change	# or %		Total		
Public Policy Direction	Entries to the repository could provide brief commentary on key public policy assumptions.				
I Itilities stakeholders	and Indigenous o	communities a	ro opcouraged	to chare additions	\.I

Utilities, stakeholders and Indigenous communities are encouraged to share additional information with each other, where appropriate. For example, municipalities and transportation planners may choose to share and discuss their fleet electrification plans and assumptions with their energy utilities.

Utilities, stakeholders and Indigenous communities could provide brief commentary to describe their data entries. For example, this commentary could describe calculation methodologies, identify data sources and explain how and why their latest entries have changed compared to their previous entries to the data repository.

7.5 **Data comparability**: How should planning data be converted for comparability?

Only some types of data need to be converted for comparability. For example, gas and electricity demand require conversion as they are presented in different units. Other types of data such as population and customer count do not require conversion.

Some types of data will remain only partially comparable, even after conversion. For instance, one petajoule of gas does not translate to one petajoule of electricity in terms of fuel-switching, due to differences in factors such as end-use efficiency (of gas furnaces versus electric heat pumps, for example). For each type of planning data that is shared, the co-ordination forum will provide input to the OEB on whether conversion is needed, how to conduct the conversion and how to interpret the converted results.

7.6 **Information discussion**: How should planning information be discussed among utilities, Indigenous communities and other participants?

The OEB proposes that meetings occur between utilities, relevant stakeholders and Indigenous communities within each region to discuss the information provided to the data repository. Discussion objectives could include the:

- Sharing of modelling best practices (e.g., by identifying planning data similarities)
- Identification of planning data inconsistencies and why they exist
- Identification of risks related to energy or infrastructure oversupply or undersupply
- Other issues as needed

During these discussions, participants could also ask each other questions and provide responses, where necessary. This may include providing each other with additional information that has not been captured in the entries to the data repository.

For clarity, requiring the use of consistent assumptions and scenarios is not an objective at this time, however, consistency is encouraged, where possible. Furthermore, participants are not expected to conduct a detailed technical review to verify or endorse the accuracy of entries to the data repository. Instead, the review and discussion should focus on directional accuracy and general consistency to support effective planning coordination and help participants cross-check and consider alternatives to their planning assumptions and scenarios. Participants may choose to provide, at their discretion, updated entries to the data repository following these discussions.

To mitigate duplication and burden, OEB proposes that these discussions occur as part of existing/planned conversations that gas and electricity utilities are already having with each other, rather than through a new process. Specifically, Section 3 and 4.1 of the

Ontario Energy Board | Gas-Electric Co-ordination Information Sharing

OEB Directive and Section 4.1 of the IESO Directive, respectively, require the establishment of an approach to ensure engagement and participation from gas and electricity distributors in the electricity regional and bulk planning processes (see Figure 6, below). The IESO and transmitters will also participate in these engagements.

Figure 6: Paraphrasing of Implementation Directive items

- s. 3 of the OEB Directive says the OEB shall ensure gas distributors participate in the electricity system planning processes where study regions overlap with their service territories.
- s. 4.1 of the IESO Directive says the IESO shall develop a process to include engagement with electricity and gas distributors as part of the regional and bulk planning processes to ensure, at a minimum, the sharing of information that is necessary to more carefully monitor electricity load growth and the timing of system needs.
- s. 4.1 of the OEB Directive says the OEB shall identify, and as the OEB deems necessary, undertake steps to support process improvements to regional and bulk planning processes, including as set out in item 4.1 of the IESO Directive (above).

The OEB proposes that these planned gas-electric regional engagements include the discussion of entries of planning information to the data repository. Participation in the repository also facilitates gas distributors' involvement in electricity planning by enabling the exchange and discussion of planning data that shapes planning outcomes. The OEB notes that the implementation of the OEB and IESO Directive items above are ongoing and will occur in parallel with the OEB's development of its framework for gas-electric information sharing and co-ordination. The OEB will co-ordinate with the IESO to foster alignment between the OEB's framework and the IESO's initiative, where appropriate.

The OEB has considered alternative options, including not requiring discussions about information provided to the data repository or allowing these discussions to occur on an ad hoc basis at the discretion of utilities. However, it believes that sharing information alone – without the certainty of accompanying discussion – does not provide a sufficient level of co-ordination to effectively support energy planning processes and the objectives of co-ordinated planning.

The OEB considered the possibility of establishing a new forum or process for such discussions but is aware that this could duplicate existing efforts and unnecessarily increase the engagement burden on gas and electricity utilities. Additionally, the OEB considered whether each of Ontario's nearly 60 electricity distributors could engage directly with the natural gas distributor operating in their respective service areas (primarily Enbridge Gas) during the development of electricity distribution system plans. However, it concluded that this approach would be overly burdensome and complex, especially for Enbridge Gas and smaller electricity distributors.

The OEB requests feedback on the extent to which utilities and the IESO should discuss the information provided to the data repository with municipalities, Indigenous communities and urban and transportation planners. These discussions will likely be less technical than those between utilities. The OEB notes that utilities and the IESO already engage with these stakeholders and Indigenous communities as part of existing planning processes. Furthermore, Section 3 of the IESO Directive requires it to consider changes to ensure meaningful engagement with municipalities and Indigenous communities for regional planning (see Figure 7, below).

Figure 7: Paraphrasing of Implementation Directive items

s. 3 of the IESO Directive says the IESO shall report back on planned changes to the processes for regional and bulk electricity planning, to ensure a consistent process for meaningful engagement with municipalities, Indigenous communities and regional Indigenous organizations. This will include consideration of energy plans developed by these groups and with a focus on fostering collaboration throughout the planning process to support timely implementation of projects.

Municipalities, Indigenous communities and urban and transportation planners could continue to be engaged as part of existing and planned engagements with utilities and the IESO. During these engagements, entries to the data repository could be discussed where appropriate.

7.7 **Information application**: How should the shared planning information be used?

The OEB believes that the sharing and discussion of planning information could inform:

- Utility and IESO energy planning
- OEB and intervenors' review of applications to the OEB
- Regulatory policy development
- Indigenous communities' energy planning
- Municipal, urban and transport energy planning

The OEB encourages Indigenous communities, municipalities and urban and transport planners to use the shared information to inform their own planning, where appropriate.

Furthermore, the OEB proposes that the following planning documents, which are typically submitted as evidence in applications to the OEB and developed by OEB-regulated entities, include a new section describing how the relevant data repository entries and discussions have been considered:

- Electricity Distribution System Plans
- Electricity Regional Infrastructure Plans
- Electricity Integrated Regional Resource Plans

Natural Gas Utility System Plans

This new section could also describe any similarities and differences between utilities' planning assumptions and explain why differences exist. As explained in earlier sections of this paper, consistent assumptions and scenarios are encouraged but not yet required.

As an alternative, the OEB is also considering the option of data repository information being compiled and discussion outcomes being summarized in a Regional Gas-Electric Co-ordination Report that is filed as evidence in relevant applications to the OEB. This report could be developed annually for high-growth regions and less regularly for other regions. Electricity and gas utilities operating in the same region, and the IESO, could collaborate on developing this report, similar to how electricity utilities and the IESO collaborate on electricity regional planning reports. The Co-ordination Report could be provided to the data repository as well for transparency and future access.

Where there is a material difference (criteria to be defined, for example, 10% or higher difference) between comparable assumptions and forecasts provided to the data repository, utilities would be expected to explain divergences or otherwise voluntarily reconcile them. Utilities would write their own justifications. These discussions, justifications and changes would be compiled in the Co-ordination Report. An entity (e.g., the IESO or largest distributor or transmitter in the region) could be required to compile input from utilities and generate this report.

For example, the Co-ordination Report could include the following table:

Table 6: Example of information for inclusion in Co-ordination Report

Information to share	Responses	Conversion	Reconciliation or explanation of differences
GDP change 2026-30	Gas utility: 1%/yr System operator: 1%/yr Electricity utility: 1%/yr [Other distributors]	Not applicable	Not applicable
Rate of heating electrification	Gas utility: 0.5%/yr System operator: 1.3%/yr Electricity utility: 1.8%/yr [Other distributors]	Not applicable	Gas utility: 1.5%/yr (reconciliation) System operator: 1.5%/yr (reconciliation) Electricity utility: 1.5%/yr (reconciliation)
Average electric heat pump efficiency	Gas utility: 200% System operator: 220% Electricity utility: 300% [Other distributors]	Not applicable	Gas utility's justification for 200% System operator's justification for 220% Electricity utility's justification for 300%

The Co-ordination Report could be a valuable tool for centralizing planning data and explanations, and enhancing comparability and ease of review for stakeholders, Indigenous communities, intervenors and the OEB. Unlike individual energy plans, which only reflect the perspective of the utility developing it, the Co-ordination Report would incorporate collaborative input from all utilities in the region, offering a more comprehensive and objective view of planning assumptions and forecasts and why divergences between data may exist. However, the OEB recognizes the added burden of developing a new Co-ordination Report and welcomes feedback on the effort and benefits of this option.

8. Conclusion

Energy for Generations, the province's Integrated Energy Plan, emphasizes the need for gas-electric co-ordination and information sharing, which will enable more accurate energy forecasting and informed decision-making. These improvements will help rightsize energy system buildout, better positioning Ontario to unlock economic growth opportunities, avoid risks of stranded assets and higher costs and respond to sectoral trends such as electrification.

This discussion paper and initial proposals respond to direction from the Minister of Energy and Mines to establish a gas-electric co-ordination information sharing forum. The forum will support energy planning processes and Integrated Energy Planning in Ontario.

Energy planning affects OEB-regulated entities, Indigenous communities and other stakeholders. As such, the OEB seeks responses to the questions presented in this paper and feedback on the OEB's proposal. Responses will inform the development of a framework to facilitate ongoing gas-electric information sharing and co-ordination in service of improving energy planning in Ontario.

9. Appendix 1: Electricity planning in Ontario

9.1 Overview

Electricity planning in Ontario is conducted at the bulk, regional and distribution system levels. The IESO forecasts and plans for resource and transmission adequacy at the provincial level. Transmitters are responsible for managing their assets, including planning for system renewal and expansion. Electricity transmitters, distributors and the IESO work together to conduct integrated planning on a regional basis. Electricity distributors forecast and plan for their communities' energy needs and maintain local electricity infrastructure.

9.2 Bulk planning

Bulk planning focuses on Ontario's long-term resource and transmission requirements. Bulk planning is conducted by the IESO and Ontario's transmitters. The IESO publishes its load forecasts and reliability assessments, including as part of the quarterly Reliability Outlook and annual Planning Outlook, and also publishes bulk transmission plans. Licensed electricity transmitters develop and seek OEB approval for transmission investment plans. Each transmitter must periodically submit a transmission system plan to the OEB as part of its cost-of-service revenue requirement application, including comprehensive documentation of the transmitter's assets, reliability, performance management and other capital planning factors in accordance with Chapter 2 of the OEB's Filing Requirements for Electricity Transmission Applications. Bulk planning is also informed by other requirements, such as those by the North American Electric Reliability Corporation (NERC).

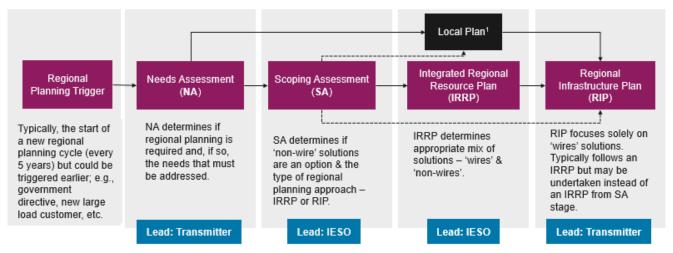
9.3 Regional planning

Ontario is divided, based on electrical connectivity, into 21 regions for regional planning, which brings together the transmitters and distributors within each region. A key aspect of the regional planning process is the evaluation of non-wires solutions, such as distributed energy resources, to address local or regional needs through integrated planning. The regional planning process is initiated at least once every five years for each of the 21 regions.

The regional planning process was designed by the industry-led Regional Planning Process Advisory Group and formalized by the OEB in 2013. Since then, the OEB has required the IESO and electricity utilities to participate in regional planning and reference regional plans to support regulatory applications. The regional planning process is presented in the Regional Planning Process Advisory Group's Report to the OEB.

Figure 8, below, illustrates the relationship among the main components or phases of the Regional Planning process.

Figure 8: Electricity Regional Planning Process



¹ Local Planning (LP) is used if a 'wires' solution is needed but regional planning / coordination is <u>not</u> required; e.g., only one LDC has a need (transmitter-led). Typically determined during NA stage to use LP but sometimes during SA stage. Completed LPs in a region are included in the RIP.

An Integrated Regional Resource Plan and/or Regional Infrastructure Plan report is referenced, where applicable, in electricity utilities' rate and leave to construct applications to the OEB.

9.4 Distribution system planning

Distribution system planning addresses electricity needs and priorities at the community level, including the connection of new customers to support growth. Electricity distributors serve the vast majority of Ontario's electricity consumers, including residential customers.

Distribution system planning is conducted in accordance with <u>Chapter 5</u> of the OEB's Filing Requirements for Electricity Rate Applications. Distribution system planning results in a Distribution System Plan that consolidates the documentation related to a distributor's approach to evaluating its performance, management of its assets and capital investment plans.

Each distributor must periodically submit its Distribution System Plan to the OEB as part of its cost-of-service revenue requirement application, and other applications as needed.

10. Appendix 2: Natural gas planning in Ontario

10.1 Overview

Due to the limited number of natural gas utilities in Ontario, bulk-, regional- and distribution-level considerations for natural gas are addressed in fewer natural gas planning processes and documents (e.g., relative to the electricity sector that has different planning processes based on the level of planning). There are two rate-regulated natural gas utilities in Ontario: Enbridge Gas and EPCOR. Enbridge Gas operates the majority of natural gas transmission and distribution pipelines in Ontario and serves nearly all natural gas customers in Ontario.

Natural gas planning products include the Asset Management Plan, Gas Supply Plan and, for Enbridge Gas, Integrated Resource Plans prepared under the Integrated Resource Planning (IRP) Framework. These planning documents are filed as evidence in applications to the OEB, where applicable.

10.2 Gas Supply Plan

The Gas Supply Plan describes a utility's approach to securing natural gas supply, upstream transportation and storage, to efficiently meet the forecast annual, seasonal and peak (design day) natural gas delivery demands of its customers. Gas supply plans are prepared by Enbridge Gas and EPCOR. The gas supply plan generally deals with the portions of the gas supply chain that are upstream of a utility's service area. Gas supply and upstream transportation are not owned by the utility and are treated as pass-through costs. These are key differences from the utility-owned and regulated assets considered in the Asset Management Plan (described next).

The OEB requires regulated natural gas utilities to file a comprehensive five-year gas supply plan for review once every five years. They are also required to submit annual gas supply plan updates. The components of gas supply plan s include demand forecasts, supply options, risk management, public policy objectives and procurement process and policies.

The OEB has established guiding principles that it applies to its assessment of gas supply plan s. The guiding principles are cost effectiveness, reliability, security and support for and alignment with public policy objectives. In its assessment of gas supply plan s, the OEB focuses on determining whether a distributor has successfully balanced all the guiding principles in a way that is prudent and appropriate for customers.

Figure 9, below, provides an overview of the gas supply plan review process.

Board Determines if **Gas Supply Plan** Stakeholder OEB Staff Report to **Written Questions Written Comments** Adjudication is Submission Conference the Board Stakeholders submit OEB Staff summarizes Distributors submit Gas For the GSP the OEB Stakeholders provide The OEB Board will Supply Plan (GSP) and questions will host a Stakeholder vritten comments the GSP or AR review determine if the Annual Report (AR) to Conference Distributors provide a and provides the Board recommendations in the OFB For AR OFB staff will GSP Revision Statemen with recommended next Staff Report should be determine whether a (Revise plan or not with steps adjudicated. conference is required or rationale) not Transcribed

Figure 9: Gas Supply Plan Process

Source: Report of the Ontario Energy Board - Framework for the Assessment of Distributor Gas Supply Plans (page 13). The OEB notes that Figure 9's use of the term "OEB Board" refers to the OEB's commissioners or panel based on the OEB's updated governance structure. It does not refer to the OEB's Board of Directors.

The OEB's Framework for the Assessment of Distributor Gas Supply Plans is available here.

10.3 Asset Management Plan

Asset Management Plans covers all utility-owned and regulated assets related to bringing natural gas to end-use customers, including transmission and distribution pipelines, distribution stations and underground storage. As with the gas supply plan, these assets must be built to meet the forecast natural gas delivery demands of a utility's customers.

The Asset Management Plans includes the utility's asset management policy, strategy and objectives, assessment of the condition of capital assets, assessment of current and future system operating conditions, etc. The Asset Management Plan should demonstrate how these elements produce an integrated capital investment maintenance and retirement plan that will drive capital and maintenance expenditures. The Asset Management Plan covers planned investments and system needs over a period of ten future years, but with a primary focus on investments occurring in the next five years corresponding with the term of cost-of-service rebasing.

While the OEB does not approve Asset Management Plans, they are updated and filed as evidence to the OEB by regulated natural gas utilities during cost-of-service applications. Additional information about this expectation is available in the OEB's *Filing Requirements for Natural Gas Rate Applications*. Enbridge Gas's Asset Management Plan is updated more frequently. A full Asset Management Plan is filed every second year, with an Asset Management Plan addendum filed in intervening years.

Additionally, the projects brought to the OEB for approval, including through leave to construct applications and IRPs (see Section 9.4, below), are expected to be aligned

with the system needs previously identified in the Asset Management Plan. For example:

- The <u>standard issues list</u> for natural gas leave to construct applications says a key issue that should be considered in these applications includes whether the applicant has demonstrated how the project fits within any relevant growth plans for the area and the applicant's Utility System Plan, including any Asset Management Plan.
- Appendix A of the IRP Framework for Enbridge Gas says leave to construct projects and IRP Plans brought to the OEB for approval are expected to reference a system need that has previously been identified in the Asset Management Plan.

10.4 Integrated Resource Planning (IRP)

IRP is a strategy and process that considers traditional (e.g., natural gas pipeline) and non-traditional (e.g., non-pipeline) solutions, and their interplay, to address the natural gas system needs that have been identified in the Asset Management Plan. The IRP Framework only applies to Enbridge Gas and features a four-step process for determining the best approach to meeting system needs.

- 1. **Identification of Constraints**: Potential system needs are identified up to 10 years into the future, which are also typically included in the Asset Management Plan. Appendix A of the IRP Framework for Enbridge Gas provides the expectation that the system needs referenced in IRP plans have been previously identified in the Asset Management Plan.
- 2. Screening Criteria: A Binary Screening Criteria is applied to assess the needs identified in the Asset Management Plan to determine whether IRP evaluation is appropriate. System needs where IRP is not screened out are considered further in the next stage of the IRP evaluation process. The screening criteria are meant to help focus efforts onto those situations where there is a reasonable expectation that an IRP Alternative could efficiently and economically meet an identified need.
- 3. Two-stage Evaluation: A two-stage evaluation is applied to determine whether to proceed with an IRP Plan to meet identified needs. The first evaluation stage involves a technical feasibility evaluation, and the second evaluation stage involves an economic evaluation. Where the two-stage evaluation process concludes that an IRP Plan is the best alternative to address an identified need, Enbridge Gas files an application with the OEB for approval of the IRP Plan. Where the process concludes that a traditional solution is the best alternative, Enbridge Gas will often require approval from the OEB through a leave to construct application.

4. Monitoring and Periodic Review: Enbridge Gas must file an annual IRP report with the OEB for information. The OEB does not approve the annual IRP report, but the report could impact the OEB's findings on the disposition of any IRP-related deferral accounts or inform future proceedings such as rates proceedings and leave to construct proceedings. The IRP annual report includes discussion on the status of IRP considerations in meeting system needs, accompanied by an Asset Management Plan update that includes an appendix section on the status of IRP considerations for each system need in the Asset Management Plan.

The OEB's *Integrated Resource Planning Framework for Enbridge Gas* is available here. The OEB is currently conducting a consultation to review and potentially update the IRP Framework (EB-2025-0125). Through this consultation, the OEB aims to assess the efficiency and effectiveness of the Framework's implementation, evaluate its impact on ratepayers and identify opportunities to improve how Enbridge Gas plans for addressing system needs.

11. Appendix 3: Possible extent of co-ordination

11.1 Spectrum of approaches for co-ordinated planning

The extent of planning co-ordination between electricity and natural gas sector entities can be characterized along a spectrum of comprehensiveness – from least co-ordinated to most co-ordinated. Co-ordinated planning in practice typically includes multiple activities on the spectrum.

The following spectrum lists the potential extent of co-ordination in planning between electricity and natural gas sector entities, from less to more co-ordinated.

- 1. **Communicate** planning information with each other. For example, electricity and natural gas entities could share their planning assumptions and outcomes with each other based on their own discretion.
- 2. Communicate planning information with each other in a **specified process** (e.g., a forum established by the OEB). For example, electricity and natural gas entities could share planning assumptions and outcomes with each other in a formal working group or forum.
- 3. Share **specified types of planning information** with each other. For example, electricity and natural gas entities could be required to share planning data with each other that the OEB determines pertinent (e.g., fuel-switching assumptions and infrastructure investment plans).
- 4. **Discuss and comment** on each other's planning information. For example, electricity and natural gas entities could be required to share and then comment on each other's planning.

- 5. Align on planning **assumptions** (e.g., use the same modelling inputs). For example, electricity and natural gas entities could be required to use the same planning assumptions such as weather projects, customer addition forecasts, etc.
- 6. Align on planning **projections** (e.g., use the same modelling outcomes). For example, electricity and natural gas entities could be required to use the same supply and demand forecasts and scenarios in their planning.
- 7. Align on planning and **investment decisions** and strategies. For example, electricity and natural gas entities could be required to ensure that the timing, capacity and location of electricity and natural gas infrastructure investments are mutually supportive.

At its initial levels, co-ordination can involve the sharing of modelling inputs and outputs between entities after these inputs and outputs have been finalized. Co-ordination may further involve the sharing of modelling inputs and outputs with the intention of peer review and discussion to inform modelling changes. Even further, co-ordination may involve using the same modelling inputs and outputs. Co-ordination may ultimately reach the level of full integration, where strategies and investment decisions are optimized together.

The Minister of Energy and Mines' Implementation Directive to the OEB specifies that co-ordination planning should involve information sharing in the short term (e.g., items 1-4, above), and the consistent use of planning assumptions and scenarios in the medium term (e.g., items 5-6, above).

Co-ordinated planning could, for instance:

- Help planning entities achieve a more informed and comprehensive consideration of their operating environments and public policy.
- **Identify and address synergies, constraints and redundancies** between the electricity and natural gas sectors.
- Address planning inconsistencies, such as underinformed or misaligned assumptions and forecasts.
- **Inform the regulatory review** of electricity and natural gas applications to the OEB and inform the OEB's decision-making.

Achieving these objectives could contribute towards beneficial outcomes for the energy sector such as avoiding overbuilding or underbuilding energy systems, avoiding gas and electricity utilities planning to meet the same need, and ensuring energy systems are appropriately maintained amidst uncertainty.

There are also challenges with implementing co-ordinated planning. For example, it could:

• Increase the complexity of already highly complex energy planning processes.

- Increase the level of effort for energy planners.
- Require electricity and natural gas entities to address differences in planning perspectives, assumptions and scenarios. However, consensus between these entities could be difficult to achieve.

11.2 Jurisdictional scan

The OEB is aware of the following examples of co-ordinated planning in jurisdictions worldwide. The OEB completed its jurisdictional scan in 2024.

Table 7: Co-ordinated Planning in Other Jurisdictions

Lead Organization	Co-ordinated Planning Actions from Organization (Includes required and/or voluntary actions)			
British Columbia Utilities Commission	BCUC requested information sharing between gas and electric utilities.			
US Federal Energy Regulatory Commission	FERC clarified, via a regulatory amendment, that information sharing is permissible between gas and electric utilities.			
Canada Energy Regulator	CER published integrated gas-electric projections for information and voluntary use in their planning.			
Manitoba Hydro	Manitoba Hydro published integrated gas-electric roadmap for information and voluntary use in planning.			
California Energy Commission	CEC published integrated gas-electric projections and recommendations that utilities consider in their energy planning.			
European Union	The EU's electricity and gas system operators published integrated gas-electric projections and assumptions that utilities consider in their energy planning.			
UK National Energy System Operator	The UK created a new gas-electric systems operator to conduct joint gas-electric planning, which informs utilities planning and investment decisions.			
Government of Quebec	Quebec is proposing to publish integrated gas-electric projections and recommendations that utilities must consider in their own energy planning and investments.			
Hydro Québec & Énergir	Quebec's largest electricity and natural gas utilities are jointly implementing a gas-to-electric fuel switching program.			

These examples of co-ordinated planning could be roughly categorized as follows:

Ontario Energy Board | Gas-Electric Co-ordination Information Sharing

Table 8: Categorization of Co-ordinated Planning Examples

Lead Organization	Utilities Share Information with Each Other	Entities Use the Same Information/ Projections	Utilities Align on Decisions/ Investments
British Columbia Utilities Commission	~		
US Federal Energy Regulatory Commission	✓		
Canada Energy Regulator		~	
Manitoba Hydro		✓	
California Energy Commission		~	
European Union	~	~	
UK National Energy System Operator		~	~
Government of Quebec		~	✓
Hydro Québec & Énergir	~	~	~

12. Appendix 4: Considerations of co-ordinated planning in Ontario

There have been considerations and examples of co-ordinated planning between the electricity and gas sectors in Ontario, though they have primarily been limited in scope. Existing examples of co-ordinated planning in Ontario do not fully align with the type and extent of co-ordinated planning required by the Minister of Energy and Mines' Implementation Directive to the OEB.

Examples of co-ordinated planning in Ontario include:

- 2003 Natural Gas Forum: The OEB reviewed natural gas regulation for opportunities to improve efficiency and effectiveness. The forum noted the need for gas-electric co-ordination mechanisms. In response, Union Gas (since amalgamated with Enbridge Gas), Enbridge Gas, TransCanada Pipelines (now TC Energy) and the IESO launched the Natural Gas Electricity Interface Review to review these issues (see bullet below).
- 2005 Natural Gas Electricity Interface Review: The Natural Gas Electricity
 Interface Review examined the implications of additional gas-fired electricity
 generation on gas infrastructure and service offerings. OEB staff recommended
 that the OEB should initiate a generic hearing (see next bullet) to review certain
 issues related to gas-fired generation.
- 2005 Natural Gas Electricity Interface Proceeding: The OEB launched a
 generic hearing to determine, among other issues, whether it should order new
 rates for the provision of gas transmission, distribution and storage services to
 gas-fired generators and other customers. In its decision, the OEB approved new
 services aimed at the needs of gas-fired generators, including high deliverability
 storage services.
- 2019 Windsor-Essex Integrated Regional Resource Plan: During the
 Windsor-Essex regional planning process, the need for new electricity, natural
 gas and other infrastructure to meet greenhouse load growth was identified.
 Enbridge Gas participated in that Integrated Regional Resource Planning
 process by attending meetings, providing information, reviewing materials and
 offering feedback.
- 2021 Regional Planning Process Advisory Group Report to the OEB: The Regional Planning Process Advisory Group (RPPAG) Report recommended, among other things, enhancing co-ordination among bulk electricity system, distribution electricity system, municipal and natural gas system planning processes. The report says that gas-electric co-ordination could help avoid planning for the same need and unintended consequences between the gas and electricity sectors. Enbridge Gas joined the Regional Planning Process Advisory Group in 2021 and participated with a view to bringing more natural gas input to

the regional planning process. Recently, Enbridge Gas was invited as an observer of select TWG meetings during the Ottawa regional planning process. The RPPAG also recommended mechanisms to support co-ordination through providing guidance to better standardize forecasting, guidance for information sharing between electricity sector entities and municipalities, and expectations for stakeholder engagement.

- 2021 Decision and Order on Enbridge Gas' Integrated Resource Planning Proposal: The OEB approved a framework for a planning strategy and process for addressing non-pipeline solutions to address Enbridge Gas's system needs. The OEB said there may be an opportunity to have Integrated Energy Planning between all energy sources in the longer term. However, the OEB concluded this would be an excessively challenging requirement during the first-generation IRP Framework. The OEB said that Enbridge Gas may co-ordinate with the IESO or local electricity distributors to facilitate electricity-based energy solutions to address a system need. However, the OEB did not establish this as a requirement for Enbridge Gas. The IRP Framework only formally applies to Enbridge Gas; however, the OEB stated that it should also be used as a resource to guide EPCOR, which operates two small gas utilities in Ontario.
- 2022 Enbridge Rebasing Application (EB-2022-0200): In its 2022 rebasing application, Enbridge Gas said it believes that energy planning in Ontario can be done in a more coordinated manner. Enbridge Gas said, "integrating gas and electric system planning would enable optimized pathway modeling for Ontario and by region, ensuring that the most cost effective, safe, reliable, and resilient transition is planned for and implemented." Enbridge Gas also said, "the integration of gas and electric system planning supports the maintenance of the gas system amidst uncertainty, as it ensures that the same need is not forecasted or planned for by both sectors."
- 2024 Enbridge Gas's System Pruning Pilot (Appendix G): Enbridge Gas has developed an approach for a system pruning pilot as an IRP solution, with implementation expected to begin in early 2026. The pilot will explore voluntary measures to disconnect customers from the natural gas system (e.g., replacing gas equipment with electric equipment) on sections of the natural gas system requiring repair/replacement, to reduce gas system renewal expenditures. One pilot objective is to identify the data needed to assess the impact of system pruning on the electrical distribution system, which will include engagement of the electricity distributor(s) in the selected pilot area.