

Mr. Ritchie Murray  
Acting Registrar  
Ontario Energy Board  
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February 24, 2026

**EB-2025-0333 – Enbridge Motion on IRP Pilot Project Decision  
Pollution Probe Submission on Threshold**

Dear Mr. Murray:

On December 22, 2025 Enbridge Gas (Enbridge) filed a Motion to Review certain elements of the Integrated Resource Plan (IRP) Pilot Decision<sup>1</sup>. On February 6, 2026, the Ontario Energy Board (OEB) issued Procedural Order No. 1 which invited parties to file submissions on whether Enbridge’s Motion meets the OEB’s threshold requirements. More specifically, Procedural Order No. 1 stated:

*Does the notice of motion to review filed by Enbridge Gas raise relevant issues material enough to warrant a review of the Decision on the merits, in accordance with Rule 43 of the OEB’s Rules of Practice and Procedure (Threshold Question).*

Rule 43 indicates that “... the Review Panel may, with or without a hearing, consider a threshold question of whether the motion raises relevant issues material enough to warrant a review of the decision or order on the merits.” Materiality is a principal element noted under Rule 43.

Previously, the OEB issued a Decision on its own review motion related to the IRP Pilot Decision<sup>2</sup>. In its Decision, the OEB determined that it is not just, expeditious or efficient to proceed with the motion, given a variety of reasons noted. The OEB noted that the upcoming IRP Framework Review would be a more appropriate proceeding to consider the set of IRP issues, including the appropriateness of funding gas-fired technologies through IRP. The OEB also noted that its decision did not mean that a different motion for review of the IRP Pilot Decision would be without merit. Elements of the OEB’s motion to review overlap with certain elements of the Enbridge motion to review, specifically related enabling IRP funding for gas-fired technologies.

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<sup>1</sup> EB-2022-0335.

<sup>2</sup> EB-2025-0124 Dec Order\_IRP Review Motion\_20251211.

Enbridge did not include with its Motion to Review the current status of the IRP Pilot Project(s) and schedule related to the Southern Lake Huron IRP Pilot Project, or the forecasted impacts that a further delay to could result in. Concurrent delays have impacted advancing the OEB ordered IRP pilot projects. The IRP pilot project(s) were ordered to be completed several years ago<sup>3</sup> and the purpose, context and impact of the Motion must be considered when assessing the merits of the Motion.

Enbridge's Motion requested variation of the IRP Pilot Decision in relation to the Review Issues to:

- i. Approve the inclusion of advanced gas technologies in the SLH IRP Pilot Project;
- ii. Remove the direction to re-allocate the budget for the denied advanced gas technologies to electrification measures;
- iii. Remove or correct the broader statements in the Decision supporting the determination not to approve initiatives that would result in the adoption of gas fired appliances and continue the use of natural gas; and
- iv. Remove the direction to consult with the IRP TWG on a second IRP pilot project on specified proposed measures, pending further direction from the current and ongoing EB-2025-0125 IRP Framework Review.

The OEB's Procedural Order No. 1 groups the requests noted above into three broader review issue categories. To be more precise,

- **Review Issue #1:** The finding that the OEB will not approve an IRP pilot project that includes incentives for advanced gas technologies,
- **Review Issue #2:** The direction that Enbridge Gas reallocate the portion of the IRP pilot project budget related to the denied advanced gas technologies to electrification measures, and
- **Review Issue #3:** The direction that Enbridge Gas must consult with the OEB's IRP Technical Working Group on a potential second IRP pilot that explores creative solutions that go beyond current demand side management (DSM) offerings, including a number of proposed measures such as alternatives to new connections.

Pollution Probe has used the original four Enbridge Motion requests to respond below. It is important to note that the IRP Pilot Decision is specific to the limited IRP Pilot(s) and is not a broader review of the IRP Framework, which the OEB has indicated that it intends to undertake separately. Does it make sense to further delay the IRP pilot(s), particularly given that the OEB intends to undertake a fulsome IRP Framework review in short order. Somehow, the IRP Pilot Project has become more than it was intended to be and appears to have become intertwined with the current IRP Framework, OEB requirements and perhaps the pending IRP Framework evaluation and review occurring as part of the recently launched EB-2025-0125 proceeding. All

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<sup>3</sup> Per the OEB deadline of 2022 set in EB-2020-0091 dec\_order\_EGI\_IRP\_20210722.

of which could further delay implementation of this overdue pilot project(s). Further delay is certainly not in the interest of advancing natural gas IRP or supporting alignment with modern infrastructure planning.

**Request #1: Approve the inclusion of advanced gas technologies in the SLH IRP Pilot Project;**  
**Request #2: Remove the direction to re-allocate the budget for the denied advanced gas technologies to electrification measures;**

Requests #1 and #2 are related. The implementation of an IRP pilot(s) is meant to be a learning opportunity based in a new or innovative approaches parallel to normal IRP implementation. The information reviewed in the IRP Pilot Project proceeding and the ultimate OEB Decision aligns with technologies that are innovative and would avoid locking in natural gas usage for the longer term. Gas technologies to retain customers or enhance the efficient use of natural gas are already supported through non-IRP ratepayer funding and those have been highlighted in several proceedings<sup>4</sup>. Consideration of enabling IRP funding to support natural gas technologies is more appropriately aligned with the considerations for the upcoming OEB IRP Framework Review.

**Request #3: Remove or correct the broader statements in the Decision supporting the determination not to approve initiatives that would result in the adoption of gas fired appliances and continue the use of natural gas;**

This request does not appear to meet the threshold under Rule 43. A detailed review and rehearing of broader statements in the IRP Pilot Project Decision will not have an impact on executing the requirements outlined under the Decision. This request is not relevant or material to impacting the actions ordered in the IRP Pilot Decision. Nothing in the IRP Pilot Project Decision precludes the ability for a future OEB panel to consider changes to the IRP Framework as part of the IRP Framework Review<sup>5</sup>.

**Request #4: Remove the direction to consult with the IRP TWG on a second IRP pilot project on specified proposed measures, pending further direction from the current and ongoing EB-2025-0125 IRP Framework Review.**

This request does not appear to meet the threshold under Rule 43. A detailed review and rehearing of broader statements in the IRP Pilot Project Decision will have no impact on Enbridge's commitments and requirement to consult with the IRP TWG on a second IRP pilot project. The requirement for Enbridge to complete two IRP Pilot Project in consultation with the OEB's IRP TWG originated in the OEB's IRP Framework Decision<sup>6</sup> and there has been no

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<sup>4</sup> Most recently in EB-2024-0111. A list of existing and funded projects for gas technologies is also included in EB-2024-0111 Exhibit I.1.10-PP-8.

<sup>5</sup> EB-2025-0125.

<sup>6</sup> EB-2020-0091 dec\_order\_EGI\_IRP\_20210722, page 90.

challenge or modification to those requirements. The OEB has restated those requirements consistently since 2021 and challenging the restatement of those requirements in the IRP Pilot Project Decision has no merit or impact to the underlying requirement. Furthermore, the OEB IRP Framework Decision summarized Enbridge's commitments to engage with stakeholders and Indigenous groups before making a determination about what IRP pilot projects to pursue and it is clearly expected that the proposed IRP TWG would provide input<sup>77</sup>. It is unclear if Enbridge request to remove the requirement to consult with the OEB's IRP TWG would also require an OEB amendment to the original IRP Framework Decision.

Respectfully submitted on behalf of Pollution Probe.



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<sup>77</sup> EB-2020-0091 dec\_order\_EGI\_IRP\_20210722, page 88.