

BY EMAIL and RESS

February 24, 2026

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

Dear Mr. Murray:

EB-2025-0333: Enbridge Gas Inc. Motion to Review Integrated Resource Planning (IRP) Pilot Decision in EB-2022-0335 - Building Owners and Managers Association Toronto's (BOMA Toronto) Submissions

Introduction

On December 22, 2025, Enbridge Gas Inc. (Enbridge Gas) filed a notice of motion to review (the Review) to reconsider the Decision and Order in EB-2022-0335, issued on March 27, 2025 (the Decision). Specifically, Enbridge Gas requested a review and variance to the following portions of the Decision:

- 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.

In its Review notice, Enbridge Gas also requested a stay of the portions of the Decision relating to Review Issues 1 through 3, inclusive, until the completion of the Review.

In its Procedural Order No. 1, issued on February 6, 2026, the OEB invites submissions from parties on:

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)?

BOMA Toronto Submission

BOMA Toronto does not believe the Review filed by Enbridge Gas raise relevant issues material enough to warrant a review of the Decision.

Review Issue #1: The OEB Decision to exclude advanced gas technologies in the SLH IRP Pilot;
Review Issue #2: The OEB Decision to reallocate advanced gas technologies budget to electrification measures budget in the SLH IRP Pilot

BOMA Toronto does not believe these OEB decisions were made in error. In its Notice of Motion for Review and Variance, Enbridge Gas states that these OEB decisions exceed the OEB's jurisdiction by favouring one energy source over another. BOMA Toronto disagree. Many OEB decisions on electricity and natural gas proceedings would ultimately affect the economics of the specific energy source(s). As an economic regulator, the OEB has the mandate to establish rules to govern the conduct of utilities and to protect the interests of consumers. There is evidence in this proceeding that demonstrates electrification IRP measures are more cost effective than the natural gas IRP measures.

The Impact of Further Delay

In EB-2022-0335 (Enbridge Gas IRP Pilot Project Application), there have been project scope changes, application updates and delays, and the approved single IRP pilot is already years behind the original timeline set by the OEB in its July 22, 2021 Decision on EGI's IRP Proposal Application (EB-2020-0091).

The design of a potential second IRP pilot that explores creative solutions that go beyond current DSM offerings will inform the important role that the commercial buildings' sector can play and it should be well underway.

Proceeding with this Enbridge Gas Review will create uncertainties and further delays to the already late timeline of Enbridge Gas's first IRP pilot and the design of a potential second IRP pilot.

Ontario cannot wait more to start taking coordinated action on IRP opportunities. Every Enbridge Gas capital infrastructure project should already be subject to a formal review of the current gas demand profile for the section of the gas system involved, and the potential peak demand reductions in related buildings.

As such, BOMA Toronto submits that this pilot project should proceed as approved with no further delay.

Respectfully submitted on behalf of BOMA Toronto,

A handwritten signature in black ink, appearing to read "Clement Li".

Clement Li
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