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AMENDMENTS TO FILING REQUIREMENTS FOR NATURAL GAS APPLICATIONS

To: All Rate-Regulated Natural Gas Distributors

What You Need to Know

- The Ontario Energy Board (OEB) is updating its filing requirements to reflect the Minister's direction to ask rate-regulated natural gas distributors to plan using more than one future demand scenario and to consider additional planning factors.
- The changes clarify what information distributors are expected to provide, while allowing flexibility in how and where that information is included in applications.
- Following receipt of written comments from gas distributors by the end of January 2026, the OEB finalized the changes on March 31, 2026. Utilities are expected to begin applying the new approach after June 30, 2026, with full compliance required for relevant applications filed after April 1, 2027.

On June 11, 2025, the Minister of Energy and Mines (Minister) issued a directive to the Ontario Energy Board (OEB) under section 25.30(2) of the *Electricity Act, 1998*, with regard to the implementation of the Integrated Energy Plan, titled *Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7*, in respect of matters falling within the OEB's jurisdiction (Directive).

In response, on December 16, 2025, the OEB issued a [letter](#) to rate-regulated natural gas distributors proposing amendments to the filing requirements for certain natural gas applications relating to sections 2.1 and 2.2 of the Directive (see Appendix 1). These

sections describe expectations for multiple demand scenarios and best practices in modelling for relevant future applications filed with the OEB by natural gas distributors.

The OEB invited rate-regulated natural gas distributors to provide written comments on the proposed amendments. On January 27, 2026, Enbridge Gas Inc. (Enbridge Gas) filed a letter providing detailed comments on the proposed amendments. The OEB has considered the feedback in finalizing the amendments to filing requirements for relevant applications as shown in Appendices 2 and 3 to this letter.

The OEB takes this opportunity to remind natural gas distributors and other interested parties that the OEB expects applicants to file applications in a manner consistent with the filing requirements unless they can demonstrate a cogent rationale for departing from them, including compliance with any order or direction of the OEB from a prior proceeding that requires otherwise. If circumstances warrant, the OEB may require an applicant to file evidence in addition to what is identified in the filing requirements.

Relevant Applications

As noted in the OEB's December 16, 2025 letter, the OEB considers the following types of applications to be relevant for the purposes of sections 2.1 and 2.2 of the Directive:

- Cost of service
- Leave to construct, where the application is for replacement or expansion of facilities, but not for applications driven entirely by customer requests
- Integrated Resource Plans (IRP)

The December 16, 2025 letter from the OEB also proposed new filing requirements for five-year gas supply plan applications to respond to the Directive. Annual updates would only be subject to those requirements in the event of a material change. At this time, the OEB is deferring implementation of any changes to these filing requirements pending the outcome of the ongoing adjudicative process for Enbridge Gas's Five-Year Gas Supply Plan.¹ The OEB will revisit filing requirements for five-year gas supply plan applications once that process has been completed.

Cost of Service Applications

The revised amendments for cost of service applications are found at Appendix 2 to this letter.

¹ EB-2025-0065, Enbridge Gas Five Year Supply Plan (2025-2030)

The OEB had originally proposed that multiple demand scenarios, as described in the Directive, would be included in the filing requirements and form part of a distributor's Rate Base and Operating Revenue evidence in cost of service applications. Enbridge Gas commented that including multiple scenarios in Exhibit 3: Operating Revenue as part of the Throughput Forecast would be of little value as the purpose of that forecast is to set rates in the test year; a more appropriate place to address multiple demand scenarios as described in the Directive would be in the Utility System Plan (USP) section of the application. In response to Enbridge's feedback, all requirements related to sections 2.1 and 2.2 of the Directive have been consolidated in the filing requirements for Exhibit 2: Rate Base as part of the USP. The OEB is committed to regulatory efficiency and also accepts Enbridge's request for flexibility regarding placement in the application and allowing cross-referencing information if it appears elsewhere in the evidence.

Enbridge Gas submitted that the OEB should not adopt the proposed additional filing requirement relating to fuel switching. The OEB is retaining this new requirement. The OEB notes that, in keeping with the Directive, information related to fuel switching is only required "where pertinent and practical." Where the filing requirements refer to 'pertinent and practical', the OEB expects applicants to file information that is directly relevant to assessing the specific project or plan and can be acted on in a meaningful way.

Enbridge Gas also questioned the relevance of adding a filing requirement related to extreme weather impacts on infrastructure resilience, given existing planning practices and the nature of natural gas distribution infrastructure. The OEB encourages applicants to continue to ensure planning frameworks incorporate extreme weather impacts on infrastructure resilience but at this time does not consider it necessary to proceed with new filing requirements related to extreme weather impacts.

Enbridge Gas also questioned the reference to ensuring planning processes consider future maximum temperatures, since natural gas demand is higher in cold weather. This requirement has nonetheless been retained given the potential for natural gas demand for power generation being higher during days with higher temperatures, which may have bearing on natural gas distribution infrastructure serving such generators. The requirement has also been simplified to require the applicant to provide a "description of how" such temperatures have been considered in demand modelling, so that applicants can satisfy this filing requirement by providing commentary on whether or not particular conditions have bearing on their modelling.

Enbridge Gas requested that the OEB justify the need for certain filing requirements by identifying any gaps in its previous applications. The Directive states, "For clarity, where

existing modelling of scenarios already meet or exceed the above requirements, no additional action is required.” The OEB confirms that including the specific expectations of the Directive into the cost-of-service filing requirements is not an indication of gaps in historic applications or standing practices. Rather, these expectations are included for transparency and consistency with the Directive and to support a comprehensive response to it.

Leave to Construct and IRP Plan Applications

The revised amendments to the filing requirements for leave to construct applications relating to sections 2.1 and 2.2 of the Directive are found at Appendix 3 to this letter.

Enbridge Gas disputed the need for multiple demand scenarios when a replacement project is required solely for safety or integrity reasons and argued that the requirement for multiple demand scenarios should only apply to projects with growth components. The OEB remains of the view that this requirement is relevant to leave to construct applications (other than those that are driven entirely by customer requests) because such applications must demonstrate need.

The OEB also confirms that an application for exemption from leave to construct under s.90(2) or s.95(2) of the *Ontario Energy Board Act, 1998* to which section 3(3) or 3.0.1 of Ontario Regulation 328/03 (General) applies does not need to include any of the new Directive-related requirements. In these applications, the substantive issue to be determined by the OEB is whether the Crown’s duty to consult, if applicable, has been adequately discharged.

Enbridge Gas requested clarity on whether province-wide demand data is sufficient for demand forecasts, particularly for smaller projects. The OEB encourages utilities to use local data where possible but recognizes this detailed information may not be available in all cases and that it may be necessary to rely on province-wide trends to forecast future demand in some applications. As with other elements of their applications, applicants are expected to justify their assumptions.

Similar to the response to Enbridge Gas’s feedback for cost of service applications above, the OEB will provide flexibility for the applicant to indicate via cross-reference if certain information is addressed elsewhere in the evidence. For example, Enbridge Gas noted that assumptions regarding cost trends are already incorporated in leave to construct applications within the evidence for Exhibit E: Project Cost and Economics. In addition, and also in response to Enbridge Gas’s feedback, the revised amendments at Appendix 3 no longer link the demand forecast to cost projections for future investments.

As noted above, the Directive limits expectations for consideration of fuel switching to circumstances where this is “pertinent and practical.” Enbridge Gas states that if it “is required to develop an IRP program or pilot that would result in customers switching from gas to electricity, that would be addressed through an IRP Plan application, rather than a [leave to construct] application.” At this time, IRP Plan applications do not have dedicated filing requirements, but are expected to include information similar to leave to construct applications, and thus rely on the filing requirements for leave to construct. Information related to fuel switching is retained to ensure consideration of costs and benefits across impacted energy systems if fuel switching is intended (whether in a leave to construct or IRP Plan application, including the possibility of a combined pipeline/IRP solution). If the applicant is of the view that this information is not pertinent or practical for a specific application, it may say so.

Implementation

The new filing requirements are effective immediately and apply in accordance with their terms to applications filed after June 30, 2026 and/or April 1, 2027 (as applicable). The OEB will complete the administrative updates to incorporate the new filing requirements into the [Filing Requirements For Natural Gas Rate Applications](#) and the [Natural Gas Facilities Handbook](#) at a later date.

Any questions relating to this letter should be directed to Registrar@oeb.ca.

Yours truly,

Damien A. Côté
Chief Commissioner

Attachment(s): Appendices - Updates to Natural Gas Filing Requirements

Appendix 1: - Excerpts from the Implementation Directive to the OEB

Pursuant to section 25.30(2) of the *Electricity Act, 1998*, and pursuant to section 35 of the *Ontario Energy Board Act, 1998*, the Minister directed the OEB, among other matters, as follows:

2.1 The OEB shall set the expectation for natural gas and electricity distributors to begin incorporating multiple demand scenarios for their planning frameworks and processes by June 30, 2026 on a best effort basis. The OEB shall encourage and, where it deems appropriate, require this for relevant applications filed after April 1, 2027. This shall include, at a minimum:

- A reference case that reflects current trends and policies in electrification of transportation, industry, and other areas that impact electricity and natural gas, along with both high and low demand scenarios that reflect reasonable incremental increases or decreases in demand with appropriate and substantiated assumptions.
- Qualitative and quantitative risk and uncertainty assessments, as appropriate, for each of the scenarios.
- For clarity, where existing modelling of scenarios already meet or exceed the above requirements, no additional action is required.
- For clarity, natural gas and electricity distributors may use modelling done by others to satisfy the requirement to assess multiple scenarios.

2.2 Encourage and, where the OEB deems appropriate, require natural gas and electricity distributors to implement or continue the following in their planning frameworks and processes for relevant applications filed after April 1, 2027, and set the expectation for utilities to begin incorporating this requirement by June 30, 2026 on a best effort basis, as the OEB deems relevant:

- Incorporate economic growth projections, including employment, population and housing.
- Incorporate cost projections for future investments that reflect reasonable assumptions for cost trends, where appropriate.
- Consider frequent and extreme weather impacts on energy infrastructure resilience and ensure future average, minimum and maximum temperatures are incorporated into demand modelling.
- Where pertinent and practical, if a system investment, policy, or program is intended to facilitate fuel switching, consider costs and benefits across impacted energy systems.

Appendix 2: Filing Requirements for Natural Gas Rate Applications

Updates to Exhibit 2: Rate Base²

Exhibit 2: Rate Base

Utility System Plan

This section will consist of a consolidated utility system plan (USP), including an asset management plan. All elements of the utility system plan must be contained in one integrated document that contains each of the prescribed components. The USP must contain all elements in one integrated and cohesive document. The USP must be filed as a stand-alone and self-sufficient document within this section of Exhibit 2.

The natural gas system encompasses regulated above and below-ground assets which can include distribution, storage, and transportation system assets. The USP must include all applicable elements from the Rate Handbook and the OEB's guidelines for natural gas utilities' transportation and distribution system projects (E.B.O. 134 and E.B.O. 188).

The USP must include the following:

- A description of the utility's investment planning process
- The engineering plan for the utility, including the overall plan for capital investments
- The longer term economic and planning assumptions, including expectations of natural gas prices
- The asset management plan (see below)
- A description of how investments are selected and prioritized
- Highlights of recent and proposed investments and the relationship to the engineering plan
- A description of how the needs of customers and overall system planning policy objectives are being reflected, including obligations stemming from Ontario Government policy including the facilitation of a cap and trade framework, relevant greenhouse gas (GHG) legislation, Demand Side Management (DSM) programs and consideration of the OEB's statutory objectives, as applicable
- Linkages to the gas supply plan
- Linkages and trade-offs between capital projects and ongoing OM&A spending

² Filing Requirements for Natural Gas Rate Applications, February 16, 2017.

An applicant shall incorporate the following additional requirements in applications filed³ after April 1, 2027:

- Multiple demand scenarios, which include⁴:
 - A reference case for demand that reflects current trends and policies in electrification of transportation, industry, and other areas that impact electricity and natural gas, along with both high and low demand scenarios that reflect reasonable incremental increases or decreases in demand with appropriate and substantiated assumptions.
 - A description of how future average, minimum, and maximum temperatures are incorporated into demand modelling.
 - A description of how economic growth projections, such as employment, population and housing are incorporated into demand modelling.
 - Qualitative and quantitative risk and uncertainty assessments, as appropriate, for each of the scenarios.
- A description of how planning frameworks have considered cost projections for future investments that reflect reasonable assumptions for cost trends, where appropriate.
- Where pertinent and practical, if a system investment, policy, or program is intended to facilitate fuel switching, consideration of costs and benefits across impacted energy systems.

³ Where this information is included elsewhere in the evidence, a cross-reference can be provided

⁴ For clarity, where existing modelling of scenarios already meet or exceed the requirement, no additional action is required. Natural gas distributors may use modelling done by others to satisfy the requirement to assess multiple scenarios.

Appendix 3: Filing Requirements- Leave to Construct Applications⁵

Updates to Exhibit B: Project Need

Exhibit B: Project Need

1. Provide an explanation of the purpose, need and timing of the proposed facilities.

This could include:

- a. The methodology and results of market research, customer attachment projections and volumetric forecasts
- b. The methodology and results of a network analysis that demonstrates that the existing system is at or nearing capacity
- c. Any risk assessments or other evidence that demonstrates the existence of an unacceptable system integrity issue
- d. A description of how planning of the proposed project was informed by customer preferences and/or was driven by benefits to customers
- e. To the extent that the applicant proposes to use a pipe size larger than required to meet the projected near or medium-term demand (approximately 10 years) (i.e., “upsizing”), an explanation as to why the larger pipe size is necessary
- f. A description of how planning of the proposed project addresses the appropriate pacing and prioritization to control costs and manage risks
- g. An explanation of why the project cannot be deferred
- h. A schedule of the proposed project’s key milestones including, at a minimum, estimated dates for:
 - i. Environmental Assessments
 - ii. Permits and approvals
 - iii. Application(s) to the OEB
 - iv. Pre-construction, construction, and testing
 - v. In-service

⁵ Filing Requirements for Leave to Construct Applications are set out in section 4.5 of the OEB’s Natural Gas Facilities Handbook

- i. Commentary on the project's key milestones to the extent that any special considerations must be taken into consideration (e.g., scheduling work around species at risk, long lead-time permits)
2. Describe the context for the project in terms of the applicant's future plans, and where possible refer to applicable growth plans, Utility System Plan (including any Asset Management Plan), or integrated resource plan; this may include identifying and describing any related projects (e.g., system reinforcements) or additional phases of the project, including the timing of those projects.
3. On a best-efforts basis for applications filed after June 30, 2026 and as a requirement for applications filed after April 1, 2027,⁶ incorporate:
 - a. Multiple demand scenarios, which include⁷:
 - i. A reference case for demand that reflects current trends and policies in electrification of transportation, industry, and other areas that impact electricity and natural gas, along with both high and low demand scenarios that reflect reasonable incremental increases or decreases in demand with appropriate and substantiated assumptions.
 - ii. A description of how future average, minimum, and maximum temperatures are incorporated into demand modelling.
 - iii. A description of how economic growth projections, such as employment, population and housing are incorporated.
 - iv. Qualitative and quantitative risk and uncertainty assessments, as appropriate, for each of the scenarios.
 - b. Cost projections for future investments that reflect reasonable assumptions for cost trends, where appropriate. Where this information is included elsewhere in the evidence, a cross-reference can be provided.
 - c. Where pertinent and practical, if a system investment, policy, or program is intended to facilitate fuel switching, consideration of costs and benefits across impacted energy systems.

⁶ The expectations of this section relating to multiple demand scenarios apply to system expansion and replacement projects. Where an application is driven entirely by customer requests, this information is not required.

⁷ For clarity, where existing modelling of scenarios already meet or exceed the requirement, no additional action is required. Natural gas and electricity distributors may use modelling done by others to satisfy the requirement to assess multiple scenarios