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BY EMAIL

April 1, 2026

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Registrar@oeb.ca

Dear Ritchie Murray:

**Re: Ontario Energy Board (OEB) Staff Submission
Enbridge Gas Inc.
Motion to Review Decision on Integrated Resource Planning Pilot Project
OEB File Number: EB-2025-0333**

Please find attached OEB staff's submission in the above referenced proceeding, pursuant to the Decision on Threshold Question and Procedural Order No. 2.

Yours truly,

Alexander Di Ilio
Efficiency and Demand Management

Encl.

cc: All parties in EB-2025-0333



ONTARIO ENERGY BOARD

OEB Staff Submission

Enbridge Gas Inc.

**Motion to Review Decision on Integrated Resource Planning Pilot
Project**

EB-2025-0333

April 1, 2026

Background and Summary

On July 19, 2023, Enbridge Gas Inc. (Enbridge Gas) applied to the OEB seeking approval for two Integrated Resource Planning (IRP) pilot projects.¹ One project was later withdrawn, and the location of the remaining proposed pilot, the Southern Lake Huron IRP pilot, was modified.

On March 27, 2025, the OEB approved Enbridge Gas's Southern Lake Huron IRP pilot with certain modifications.² Specifically, the OEB did not approve funding for natural gas equipment incentives, finding such incentives to be inconsistent with the purpose of IRP. The OEB also ordered that \$1.5 million be reallocated to support Limited Electrification Measures.

On March 27, 2025, the OEB initiated its own motion to review the Southern Lake Huron IRP pilot Decision and Order (the OEB Motion). On December 11, 2025, the OEB determined that the review would not proceed as hearing the questions raised for review was not likely to result in the most just, expeditious, and efficient determination of matters before the OEB.³

In Procedural Order No. 1 of the OEB Motion, the OEB acknowledged the unique circumstances of the proceeding and accordingly indicated that it would permit any party to file a separate motion to review the Southern Lake Huron IRP pilot decision within 20 days of the OEB rendering its decision on the OEB Motion.⁴ Enbridge's notice of motion to review was filed with the OEB within this 20-day window. On December 22, 2025, Enbridge Gas filed a notice of motion to review the Southern Lake Huron IRP pilot Decision and Order.⁵ Enbridge Gas also requested a stay of specific portions of the Southern Lake Huron IRP pilot Decision until the completion of the review.

In Procedural Order No. 1 of this proceeding, the OEB identified three Review Issues, as noted below:⁶

- **Review Issue #1:** The finding that the OEB will not approve an Integrated 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.

¹ EB-2022-0335, Application and Evidence, July 19, 2022

² EB-2022-0335, Decision and Order, March 27, 2025

³ EB-2025-0124, Decision and Order, December 11, 2025

⁴ EB-2025-0124, Procedural Order No. 1, October 6, 2025

⁵ EB-2025-0333, Motion to Review, December 22, 2025

⁶ EB-2025-0333, Procedural Order No. 1, February 6, 2026

- **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 offerings, including a number of proposed measures such as alternatives to new connections.

In its Decision on Threshold Question and Procedural Order No. 2, the OEB determined that the motion to review the Southern Lake Huron IRP pilot requested by Enbridge Gas met the threshold test, per Rule 43 of the OEB’s [Rules of Practice and Procedure](#).⁷ In the Decision on Threshold Question and Procedural Order No. 2, the OEB also granted Enbridge Gas with the requested stay pending the determination of the motion on its merits. Furthermore, the OEB invited intervenors and OEB staff to provide written submissions on the merits of the review motion and on the appropriateness and duration of any stay in the implementation of the requirement for Enbridge Gas to develop a second pilot.

OEB Staff Submission

OEB staff understands that the OEB has specifically defined the three issues as the principle matters under consideration for the review motion. OEB staff is of the view that the three issues can be reduced to two core matters, as identified below:

- The role, if any, that advanced natural gas technologies and electrification technologies should play within IRP in Ontario.
- Whether Enbridge Gas should be required to consult with the OEB’s IRP Technical Working Group on a potential second IRP pilot.

OEB staff does not consider this review likely to result in the most just, expeditious and efficient determination of the core matters noted above. OEB staff is of the view that the matters noted above are best considered as part of the OEB’s IRP Framework Review. This position is consistent with the OEB Motion Decision. In that Decision, the OEB found that “it is preferable that the matters of importance to Enbridge Gas be considered in the context of a broader review of IRP policies”.⁸ The OEB also found that the IRP Framework Review would provide opportunity to undertake a broad review of issues, thereby offering a more appropriate forum to evaluate gas-fired technologies in the context of IRP.⁹ The core matters in this proceeding, as well as the alignment of the IRP Framework with the Province of Ontario’s Integrated Energy Plan and Natural Gas Policy Statement, are and will continue to be considered and addressed as part of the

⁷ EB-2025-0333, Decision on Threshold Question and Procedural Order No. 2, March 24, 2026

⁸ EB-2025-0124, Decision and Order, December 11, 2025, p. 5

⁹ EB-2025-0124, Decision and Order, December 11, 2025, p. 6

OEB's ongoing IRP Framework Review.¹⁰ Through this process, stakeholders, including Enbridge Gas, have already had (and may have further) opportunity to comment and/or provide any additional suggested changes to the IRP Framework for the OEB's consideration. Further, the IRP Framework Review provides an opportunity to consider these and other IRP-related issues in an integrated manner. OEB staff expects that an updated, OEB-approved IRP Framework will be an outcome of the IRP Framework Review, which could address the matters noted above and will provide broad direction related to IRP going forward. Based on the above discussion, OEB staff submits that the OEB should fully dismiss the Enbridge Gas review motion.

~All of which is respectfully submitted~

¹⁰ The Province of Ontario's Integrated Energy Plan and the Natural Gas Policy Statement affirms that the province will "continue to support the important role of natural gas in Ontario's energy system and economy while pursuing options to lower costs and reduce emissions through energy efficiency, electrification, clean fuels (e.g., renewable natural gas, low-carbon hydrogen) and carbon capture and storage."