

Mr. Ritchie Murray
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Ontario Energy Board
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Toronto, ON M4P 1E4

April 2, 2026

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

Dear Mr. Murray:

On March 24, 2026 the Ontario Energy Board (OEB) issued Procedural Order No. 2 which invited parties to file submissions related to the merits of the Enbridge Gas (Enbridge) Review Motion. On February 24, 2026, Pollution Probe filed submissions¹ related to the threshold questions posed by the OEB. Pollution Probe organized those comments into the original four requests outlined in the Enbridge Motion to Review certain elements of the Integrated Resource Plan (IRP) Pilot Decision². More specifically:

- 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;
- 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;
- 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.

Procedural Order No. 2 requested submissions related to the seven errors alleged by Enbridge and on the appropriateness and duration of any stay/delay in implementation of the requirement to develop a second pilot beyond the decision on the merits. The seven errors alleged by Enbridge are that the portion of the EB-2022-0335 Decision pertinent to the four Enbridge requests:

¹ PollutionProbe_SUB_MotionThreshold_20260224.

² EB-2022-0335.

- 1) goes beyond the issues in the Southern Lake Huron (SLH) IRP Pilot Project proceeding;
- 2) is not supported by the evidence;
- 3) is procedurally unfair;
- 4) exceeds the OEB's jurisdiction;
- 5) is inconsistent with Ontario energy policy;
- 6) does not align with the IRP Framework Review, and
- 7) conflicts with the intent of IRP.

Each of the four requests from Enbridge are independent of each other and need to be considered individually. Therefore, Pollution Probe has included submissions related to each of the four Enbridge requests below, with consideration to the seven errors alleged.

Pollution Probe appreciates the early filing of OEB Staff's submission which provides an opportunity for efficiency and to avoid duplication. Pollution Probe agrees with OEB Staff that the substantive issues raised by Enbridge can simply 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.

Similar to OEB Staff, Pollution Probe does not consider this review likely to result in the most just, expeditious and efficient determination of the core matters noted above. The EB-2022-0335 Decision was specific to the IRP Pilot Project(s) and the scope as identified in that proceeding. A broader IRP Framework request from Enbridge to consider enabling IRP funding to support natural gas technologies is best considered as part of the OEB's IRP Framework Review. It is inefficient and inappropriate for Enbridge to use this Review Motion as a prelude to policy changes it wished to promote in the IRP Framework Review. The Decision for EB-2022-0335 is supported by the scope and evidence of that proceeding and no adjustments to that Decision are required.

Additional feedback related to the Enbridge Review Motion Requests is provided below.

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.

The scope of the OEB's EB-2022-0335 Decision is directly related to scope of the proceeding as determined through the Issues List included with Procedural Order No. 2³. The scope of the

³ EB-2022-0335 dec on issues list_po2_IRP Pilot Projects_20231005.

proceeding specifically considered the appropriateness of the proposed measures and consideration of applying electric and advanced gas technologies. A thorough procedural approach was used over 17 months⁴ and there was no challenge to the scope of the proceeding and consideration of these options. The process included a review of the evidence submitted, detailed interrogatories, a technical conference and written submissions. The record of the proceeding identified fundamental issues associated with the gas measures proposed by Enbridge and specifically identified the electric measures as more efficient, effective and aligned with IRP outcomes, as applied through the pilot project(s).

In fact, in addition to the clear Issues List and record in the proceeding, Pollution Probe specifically addressed this very issue in its Argument. An excerpt is included below⁵ and additional information is included in Pollution Probe's Argument and on the public record in the proceeding.

Pollution Probe recommends that the OEB require the gas measures be removed from the IRP Pilot, specifically, hybrid heating, natural gas heat pumps and gas-fired thermal energy storage (although non-gas energy storage could be considered). The proposed funds should be reallocated to the other measures, such as electric cold-climate air source heat pumps. This was a strong recommendation by the OEB IRP TWG and it was dismissed by Enbridge in favour of technologies that would retain natural gas customers, rather than maximize IRP benefits. There are more cost effective and modern non-gas technologies available today that should be used.

The OEB Decision aligned with this recommendation and the reallocation of the funding initially targeted by Enbridge toward gas technologies. It is as simple as that. To suggest that the OEB erred on its Decision based on OEB authority, scope, process or facts of the proceeding is simply an attempt to throw spaghetti at a wall (after the Decision) to see if anything sticks. The claim is baseless based on the facts and reality of the proceeding.

There is nothing within the IRP Framework excluding the application of electric IRP alternatives in the IRP Pilots. In fact, Enbridge proposed and supported their inclusion in its IRP Pilot application. Previously, Enbridge has acknowledged that there is no question of OEB jurisdiction related to electric IRP alternatives⁶. Enbridge may be disappointed that it is not able to use IRP funding from the Southern Lake Huron IRP Pilot Project to retain natural gas customers by installing new gas technologies, but to suggest that the proceeding did not properly, fairly and adequately consider the evidence is retroactive wishfulness. Aside from the evidence on the record of the proceeding,

⁴ Enbridge application was filed December 2023 and the Decision was issued May 2025.

⁵ EB-2022-0335 PollutionProbe_ARG_20241007, page 7, Recommendation #4.

⁶ EB-2025-0064 Exhibit I.1.13-PP-17e.

Enbridge has now suggested that the Decision is inconsistent with Ontario energy policy. This interpretation is not based on objective reality. Enbridge's hypothesis centers on an incorrect extrapolation of isolated broad policy language that has no specific pertinence or relevance to actual IRP issues and in particular, the IRP Pilot Project(s). The OEB is aware that Enbridge has suggested the same extrapolation in other proceedings. Enbridge recently confirmed that Ontario's Integrated Energy Plan⁷ has only four page references out of the 152 pages of the Integrated Energy Plan (less than 3%) with any wording related to natural gas. The primary focus of the document is on other policy issues related to the energy transition, including efficient electrification. If the Province intended specific direction related to the IRP Pilot Project(s), it would have included it clearly in the Integrated Energy Plan and/or relevant directives. This clearly did not occur and should not be extrapolated.

Enbridge did actually shared the list of natural gas broad references across those four pages of the Integrated Energy Plan⁸ and nothing provides new policy direction contrary to any elements of the EB-2022-0335 Decision. Enbridge has also chosen to dismiss the Provincial Pathways Study⁹ released in parallel on the same day as the Integrated Energy Plan. All of this can be assessed again in detail in the OEB's IRP Framework Review and has no actual impact on the EB-2022-0335 Decision.

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.

As noted above, there is no basis to make the requested change to the EB-2022-0335 Decision and any specific changes to the IRP Framework on a go forward basis can be argued by Enbridge during the upcoming IRP Framework Review.

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.

As noted, the requirement for Enbridge to undertake a second IRP Pilot Project in accordance with the OEB EB-2022-0335 Decision is not in question and has not been challenged. Enbridge is challenging the requirement to consult with the OEB's IRP TWG on relevant IRP options in the second pilot. The requirement to consult with the IRP TWG on relevant IRP alternatives does not originate from the EB-2022-0335 Decision; that Decision simply applies what is already a requirement, specifically to the IRP Pilot Project(s). The EB-2022-0335 Decision and related IRP Framework is packed with requirements for Enbridge to consult with the OEB's IRP TWG on IRP

⁷ [Energy for Generations](#)

⁸ EB-2025-0065 Exhibit I.6-PP-13

⁹ [Cost Effective Energy Pathways Study for Ontario](#) which further illustrated the importance of the electrification elements in the Integrate Energy Plan.

alternatives, including on the IRP pilots. The references are too numerous to list, but some examples include:

- The OEB expects that two IRP pilot projects will be selected and deployed by the end of 2022 as proposed by Enbridge Gas. The pilots are expected to assist in understanding and evaluating how IRP can be implemented to avoid, delay or reduce facility projects. The detailed consideration of IRP pilot projects should commence shortly after the issuance of the IRP Framework with input being sought from the IRP Technical Working Group¹⁰.
- Technical Working Group to support IRPA development and to identify and discuss new IRP solutions¹¹.
- Technical Working Group's first priorities will be the consideration and implementation of IRP pilot projects¹².
- Enbridge to consult with the IRP TWG for both pilots as a test ground for the IRP DCF test¹³.

Through proper procedural process set by the OEB in EB-2022-0335, the OEB enable input from all parties, including Enbridge on the Issues List and the final Issues List was issued¹⁴, including Issue 5.1: *Has Enbridge Gas appropriately engaged with stakeholders and the IRP Technical Working Group on each Pilot Project?*

A consideration of the facts occurred during the proceeding and the OEB issued its Decision in alignment with reasonable judgement based on the facts. There is no basis to make the requested change to the EB-2022-0335 Decision.

Appropriateness and duration of any stay/delay

As the OEB is aware, concurrent delays have impacted advancing the OEB ordered IRP Pilot Project(s). The IRP Pilot Project(s) were ordered to be completed several years ago¹⁵ and the purpose, context and impact of the Review Motion must be considered when assessing the merits of the Motion. Enbridge has not taken the actions required to deliver on the OEB Order and in fact suggested that it did not feel that it needed to proceed with the second IRP Pilot project ordered by the OEB¹⁶. The OEB's IRP Pilot Decision was clear that there has been no

¹⁰ EB-2020-0091 dec_order_EGI_IRP_20210722, page 9.

¹¹ EB-2020-0091 dec_order_EGI_IRP_20210722, page 14.

¹² EB-2020-0091 dec_order_EGI_IRP_20210722, page 7.

¹³ EB-2020-0091 dec_order_EGI_IRP_20210722, page 6.

¹⁴ EB-2022-0335 dec on issues list_po2_IRP Pilot Projects_20231005.

¹⁵ Per the OEB deadline of 2022 set in EB-2020-0091 dec_order_EGI_IRP_20210722.

¹⁶ EB-2022-0335 REVISED Final Transcript for EB-2022-0335 Technical Conference August 27 2024, page 142, lines 19-20.

change in that requirement which was a result of the original 2021 IRP Decision¹⁷ and has not been challenged or modified.

On that basis, Pollution Probe believes that the stay would appropriately remain until a decision is delivered on the Review Motion. The stay only applies to the activities and portion of the budget related to the proposed application of gas technologies, i.e. the reallocated budget portion. The remainder of the Southern Lake Huron IRP Pilot Project is proceeding without delay or challenge. Once the stay is ended, the OEB should be clear on the expediency needed by Enbridge to deliver on the IRP Pilot results. Further delay will impede the value intended by the IRP Pilot Project(s) which is meant to support the long-awaited advancement of gas IRP in Ontario.

Respectfully submitted on behalf of Pollution Probe.



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¹⁷ EB-2020-0091 dec_order_EGI_IRP_20210722.