

BY EMAIL and RESS

April 2, 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

In accordance with Ontario Energy Board's (OEB) Decision on Threshold Question and Procedural Order No.2, BOMA Toronto submits the response below on the merits of the review motion.

Background

On December 22, 2025, Enbridge Gas Inc. (Enbridge Gas) filed a notice of motion to review the Southern Lake Huron IRP pilot Decision and Order. Enbridge Gas requested a stay of specific portions of the Southern Lake Huron IRP pilot Decision until the completion of the review. In its February 6, 2026 Procedural Order No. 1, the OEB identified three Review Issues:

- 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.
- 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. 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.

BOMA Toronto Submissions

BOMA Toronto has reviewed OEB Staff's early filing of its submissions on this matter. We fully agree with OEB Staff's view (and rationales) that this review is not likely to result in the most just, expeditious and efficient determination of the core matters noted above. Rather than submitting duplicate comments, BOMA Toronto points to OEB Staff's submission, which has effectively provided rationales for its recommendations.

BOMA Toronto continues to point out that - 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. We have already discussed the impact of further delay in BOMA Toronto's February 24, 2026 submissions.

As such, BOMA Toronto submits that the OEB should fully dismiss the Enbridge Gas review motion.

Respectfully submitted on behalf of BOMA Toronto,

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

Clement Li

Director, Policy & Regulatory Development

Enerlife Consulting Inc.

cli@enerlife.com