WHAT WE HEARD

Gas-Electric Co-ordination and Information Sharing (EB-2025-0227)

Summary of Written Comments on Staff Discussion Paper

On December 17, 2025, the OEB issued a Staff Discussion Paper on Gas-Electric Co-ordination Information Sharing and invited feedback on the design of an information sharing framework through 10 questions covering outcomes and objectives, scope and process. The OEB received 24 written submissions from a range of stakeholders and Indigenous communities. A summary of consistent themes we heard from these written comments follows.

Current state, Outcomes and Objectives

- **Gas-electric co-ordination is increasing, but uneven**: Written comments broadly agreed that gas and electricity planning still largely occurs in silos but co-ordination is increasing in some planning processes, particularly for high-growth areas. Some comments said current co-ordination remains ad hoc, project-specific, informal, lacks transparency and is insufficient for the demands of the energy transition. Others suggested that existing planning transparency and co-ordination is sufficient.
- **A systemic co-ordination barrier is lack of alignment in methodologies and standards, rather than data availability:** A main limitation identified was the lack of standardized definitions, templates and shared assumptions for key planning inputs. Asymmetrical information sharing between the electricity and gas sectors, along with misaligned planning cycles, geographies and methodologies, limits data comparability and hinders identification of synergies.
- **Information sharing and co-ordination should be targeted, pragmatic and build on what already works:** Most comments cautioned against full integration of planning processes or the creation of overly complex new processes. Instead, they supported formalizing and scaling proven co-ordination approaches, focusing on high quality information exchange where there are demonstrable cross-sector and consumer benefits.
- **Objectives should emphasize maintaining affordability, reliability and supporting cost-effective infrastructure deployment, without prescribing outcomes:** There was strong support for objectives aimed at timely, cost-effective infrastructure investments that benefit ratepayers and avoid over- and under-building in both systems. Most comments emphasized that a co-ordination framework should be data-driven, technology-neutral, preserve customer choice and enable flexible solutions (including non-wires/non-pipes alternatives), rather than favouring one fuel over another. Many also said the objectives of improved transparency and strengthened evidence in

applications should translate into measurable improvements in regulatory efficiency. Indigenous communities said Indigenous rights-based and environmental stewardship objectives should be meaningfully reflected in this work.

- **Inclusive planning and broader system alignment is essential to success:** Effective co-ordination must extend beyond utilities to include and integrate Indigenous rights-holders, municipalities, transit agencies and system-critical providers like TransCanada Energy, generators and DER providers into the planning process.

Information Scope and Management

- **Direct bilateral/multilateral information sharing was preferred**: Most comments emphasized the value of direct information sharing, supported by non-disclosure agreements where appropriate, to facilitate timely and actionable planning. Views on a central data repository were mixed due to concerns about data security, timeliness, confidentiality and burden, though some submissions saw value in it for transparency and access for non-utility parties. A hybrid approach, combining direct sharing of more granular and sensitive information with a centralized provincial-level data repository was suggested. Where a repository is used, strong governance and safeguards against misinterpretation and misuse were consistently emphasized.
- **Information sharing should focus first on developing a prioritized set of cross-sector, clearly defined planning inputs**: There was general agreement that the forum's first task should be to create a prioritized list of information to be shared with clear definitions, units, timing and geographic level. Comments supported Table 5 of the OEB Discussion Paper as a strong starting point, but proposed approximately 80 additional data points. Submissions emphasized an early focus on cross-sector input assumptions that have a high impact on this project's objectives, with frequently cited additions including data related to large user connections, peak capacity, system constraints, DERs, non-wires/non-pipes alternatives, district energy, transit fleet, and municipal and Indigenous community energy and land-use plans. Some comments also suggested that information sharing should prioritize "factual" inputs (e.g., customer count and weather) over "assumption-based" inputs (e.g., rate of electrification).
- **Geographic scope should be flexible and purpose-driven**: There was no agreement on a single geographic standard. While some supported alignment with existing electricity regional planning boundaries for consistency, many cautioned against converting gas data into electricity boundaries due to technical challenges and a risk of misinterpretation. A common theme was that data at different geographic levels serves different planning purposes. Distribution- or municipal-level data informs regional and local planning, while provincial-level or aggregated data informs system-wide assumptions and provides a common provincial policy context that flows into more granular levels of planning.
- **Data comparability requires standardization**: Written comments stressed that comparability through simple conversions can obscure real system differences. Core

enablers of comparability include a shared data dictionary/taxonomy, aligned timeframes and transparent modelling methods that are understood by both sectors. Comparability should focus on high-level input assumptions, rather than single-point conversions, and should extend beyond energy to broader system impacts (e.g., greenhouse gas emissions, ecological and land-use effects).

Information Discussion and Use of Shared Information

- **Gas-electric co-ordination planning information should be discussed through existing planning forums**: Comments strongly cautioned against creating new standing meetings and emphasized leveraging existing bulk, regional and utility planning forums for discussions, as well as ad-hoc discussions where needed.
- **Information sharing and discussions should inform planning and support regulatory review, not drive towards identical scenarios**: Discussions should focus on identifying planning inconsistencies, risks, sensitivities and best practices to improve alignment across gas and electricity planning while preserving utility discretion and professional judgment to consider local needs and uncertainty. In addition, non-utility participants, particularly Indigenous communities, municipalities and transit providers, highlighted the value of access to shared information and participation in discussions to help validate utilities' planning assumptions, surface partnership opportunities and inform their own planning.
- **Discussions should enable earlier engagement, be inclusive and capacity-supported**: Submissions emphasized that discussions should enable early and iterative engagement before infrastructure decisions are made, with participation from a wide range of stakeholders and Indigenous communities as co-planning partners. The need for capacity funding to help support Indigenous participation was raised, along with the importance of recognizing Indigenous governance processes.
- **Use existing planning documents to demonstrate shared information and discussions were incorporated**: There was some support for creating a new Regional Gas-Electric Co-ordination Report, but most submissions viewed it as burdensome and duplicative. Instead, requiring utilities to document how shared information and discussions were considered within existing planning documents was favoured. The focus of this should be on demonstrating how agreed methodologies and assumptions were considered.
- **Timing of information sharing and discussions should align with existing planning cycles and material changes**: Most submissions supported annual information sharing aligned with existing planning cycles, with updates only when material changes occur and more frequent updates in high-growth areas. Information should be shared sufficiently in advance of key planning milestones to allow meaningful review and discussion. With respect to forecast horizons, submissions preferred aligning with existing planning and rebasing practices, with many calling for 20-plus year outlooks.

- **Roles and responsibilities should be clear and proportionate**: There was general support for the roles outlined in the OEB's Discussion Paper, with the OEB being responsible for setting the framework, governance, oversight and accountability measures, the IESO providing bulk-system context and integrating inputs into bulk/regional planning and utilities remaining data owners. Views differed on whether broader non-utility participation should be voluntary or mandatory.

Other Issues

- **Gas-electric information sharing and co-ordination must recognize First Nations not merely as "stakeholders" but as rights-holders with constitutionally protected Aboriginal and treaty rights**: Submissions from Indigenous communities emphasized that energy planning decisions engage directly with rights to lands, waters and resources on traditional territories and must be aligned with the principles of the United Nations Declaration on the Rights of Indigenous Peoples, including the principle of free, prior and informed consent.
- **Effective gas-electric co-ordination will be resource-intensive:** Many submissions noted that gas-electric information sharing and co-ordination will require more resources for both utilities and non-utility participants, requiring flexibility to fund designated resources in a phased way.
- **Establishing the use of consistent assumptions and scenarios in the medium term has value where appropriate:** Submissions suggested focusing on where and when consistency is appropriate, while recognizing that regional differences, different planning timeframes, sector-specific risks, innovation and inherent uncertainty must be considered in planning decisions as well.
- **Gas-electric co-ordination should be aligned with parallel OEB initiatives**: Some comments highlighted the importance of drawing linkages between this work and other related OEB and Integrated Energy Plan initiatives, particularly those affecting system planning, to avoid duplication and siloed implementation.
- **The framework should remain flexible to accommodate emerging fuels:** Some submissions identified hydrogen and renewable natural gas as fuels that could affect future gas-electric system interactions and therefore, should be within the scope of this framework.