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Enbridge Gas Inc.
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VIA EMAIL and RESS

April 10, 2026

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ritchie Murray:

**Re: Enbridge Gas Inc. (“Enbridge Gas” or the “Company”)
Ontario Energy Board (“OEB”) File No. EB-2025-0333
Motion to Review Decision on Integrated Resource Planning (“IRP”) Pilot
Project
Reply Submission on the Merits of the Review Motion**

Pursuant to the OEB’s Procedural Order No. 2 dated March 24, 2026 in the above-noted proceeding, enclosed please find Enbridge Gas’s reply submission on the merits of the Review Motion.

If you have any questions, please contact the undersigned.

Sincerely,

Haris Ginis

Haris Ginis
Technical Manager, Regulatory Applications

cc: David Stevens (Aird & Berlis LLP, Enbridge Gas Counsel)
Patrick Copeland (Aird & Berlis LLP, Enbridge Gas Counsel)
Michael Millar (OEB Counsel)
Alexander Di Ilio (OEB Staff)
Intervenors (EB-2025-0333)

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sched. B, as amended;

AND IN THE MATTER OF the OEB's EB-2022-0335 Decision and Order dated March 27, 2025.

AND IN THE MATTER OF Rules 8 and 40, 42 and 43 of the *Rules of Practice and Procedure* of the Ontario Energy Board

ENBRIDGE GAS INC.

Motion to Review and Vary OEB's March 27, 2025 Decision in Enbridge Gas Inc.'s IRP Pilot Project Application

Reply Submission of Enbridge Gas Inc.

April 10, 2026

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A. INTRODUCTION

1. On December 22, 2025, Enbridge Gas Inc. (“**Enbridge Gas**” or the “**Company**”) filed a Notice of Motion (the “**Notice of Motion**”) to Review the OEB’s Decision and Order in the EB-2022-0335 IRP Pilot Project Application issued on March 27, 2025 (the “**Decision**”)¹. Enbridge Gas repeats and relies on the Notice of Motion. Unless otherwise noted, defined terms used herein have the same meaning ascribed to them in the Notice of Motion.
2. In the Notice of Motion, Enbridge Gas seeks review and variance of those portions of the following items (referred to herein as the “**Review Issues**”):
 - (a) The finding that the OEB will not approve an IRP pilot project that includes incentives for advanced gas technologies;
 - (b) The direction that Enbridge Gas reallocate the portion of the Southern Lake Huron (“**SLH**”) IRP Pilot Project budget related to the denied advanced gas technologies² to electrification measures; and
 - (c) The direction that Enbridge Gas must consult with the IRP Technical Working Group (“**IRP TWG**”) on a potential second IRP pilot that explores creative solutions that go beyond current DSM program offerings, including a number of proposed measures such as alternatives to new connections.
3. On March 24, 2026, the OEB issued Procedural Order No. 2 (“**PO #2**”) finding that the Company’s Motion to Review (the “**Motion**”) meets the OEB’s threshold test under Rule 43 of the Rules of Practice and Procedure (the “**Rules**”).
4. Pursuant to PO #2, all ten intervenors, plus OEB staff, were provided an opportunity to file submissions on the merits of the Motion. Parties were also invited to file submissions on the appropriateness and duration of any stay of the direction in the Decision for Enbridge Gas to develop a second IRP pilot project.
5. Ultimately, only five submissions were filed (collectively, the “**Responding Submissions**”) by OEB staff, Building Owners and Managers Association Toronto

¹ [EB-2022-0335 Decision and Order, March 27, 2025](#) (Decision).

² Enbridge Gas proposed a budget of \$1,522,560 for various gas-based technologies (hybrid heating, natural gas heat pumps, thermal energy storage). The OEB allowed funding for thermal energy storage but not for natural gas heat pumps or hybrid heating. The portion of the budget for simultaneous hybrid heating and natural gas heat pumps is \$1,229,514.

(“**BOMA**”), Environmental Defence Canada Inc. (“**ED**”), Pollution Probe (“**PP**”), and the School Energy Coalition (“**SEC**”).

6. Enbridge Gas files these Reply Submissions in accordance with PO #2.

B. OVERVIEW

7. Enbridge Gas’s Notice of Motion sets out the grounds for why the OEB should vary the Decision in relation to the Review Issues. In short, the aspects of the Decision that deny any current or future role for gas-fired technologies within IRP and favour electrification instead are in error. The related findings and directions go beyond the scope of the SLH IRP Pilot Project proceeding, are not supported by evidence and are inconsistent with Ontario energy policy.

8. While other arguments are advanced (and will be responded to further below), the Responding Submissions primarily rely on two core premises. First, parties assert that the matters at issue in this Motion are better and more efficiently addressed in the ongoing EB-2025-0125 IRP Framework Review consultation (the “**IRP Framework Review**”). Second, some parties argue that the exclusion of gas technologies in the Decision was justified because electrification measures are more cost-effective. Neither of these positions withstand scrutiny.

9. Relying on the IRP Framework Review to address the matters raised by this Motion ignores the practical reality that the Decision will inevitably influence how that review will be argued, analyzed, and ultimately decided. Left uncorrected, the Decision risks anchoring the IRP Framework Review to contested and erroneous assumptions reached in a proceeding that was never intended to resolve framework-level questions. Deferring these concerns to the IRP Framework Review would therefore undermine, rather than promote, an efficient and just resolution.

10. The cost-effectiveness arguments advanced by intervenors are similarly misguided. The Decision was not a comparative cost-effectiveness assessment. Rather, the Decision rested on a policy determination that gas technologies are

incompatible with IRP as a matter of principle. Seeking to rationalize this conclusion with the purported cost-effectiveness of certain gas technologies misunderstands this fundamental point at issue in this Motion.

11. In any event, given that the federal fuel charge is now \$0, it is more likely that customers may choose gas-based options over electric alternatives. None of the Responding Submissions consider this fact.
12. More generally, the Decision, and the arguments advanced in its support, rest on either the implicit or explicit premise that excluding gas technologies is consistent with government policy. The opposite is true.
13. The unambiguous policy of the Ontario government is to promote customer choice, fuel diversity, and flexibility. The government has explicitly noted the ongoing and central role natural gas is to have in ensuring that Ontario's energy needs are met. Neither the OEB nor the intervenors are at liberty to substitute their own fuel preferences in contravention of the government's policy.
14. The Decision categorically rejects gas technologies as incompatible with IRP. Both the Decision and the Responding Submissions reflect a fuel preference that is not simply inconsistent with government policy, but would actually contradict it.
15. These arguments, along with others advanced in the Responding Submissions, are further addressed below.

C. THE TEST FOR MOTIONS TO REVIEW

16. Rule 42.01(a) of the OEB's *Rules of Practice and Procedure* contemplates that a review motion may be granted where the OEB made a material and clearly identifiable error of fact, law or jurisdiction. The onus is on the moving party to raise a question as to the correctness of the order or decision.³ For example, the moving party must demonstrate that the findings are contrary to the evidence before the panel, that the panel failed to address a material issue, that the panel

³ [EB-2016-0005 Decision on Motion to Review and Vary by the City of Hamilton, March 3, 2016](#), page 4.

made inconsistent findings or something of a similar nature.⁴ The moving party must also demonstrate that the alleged error is material and would vary the outcome of the decision.⁵

17. Under Rules 40 and 43, the OEB has the power to vary, suspend or cancel the decision at issue in a review motion.

D. OVERVIEW OF THE COMPANY'S POSITION

18. PO #2 did not invite Enbridge Gas to file Argument in Chief on the merits of the Motion.
19. In order to contextualize the Company's reply to the Responding Submissions, it is important to first briefly outline the basis for the Motion.
20. As set out in the Notice of Motion, the main item from the Decision that Enbridge Gas seeks to vary is the OEB's determination to deny the advanced gas technologies portion of the SLH IRP Pilot Project budget and re-direct the associated funds to electrification measures. This includes the OEB's specific findings that: "*the OEB will not approve an IRP pilot project that includes incentives for gas equipment*"⁶ and "*The OEB does not approve funding for hybrid heating or natural gas heat pumps, both of which would incent new gas-fired heating equipment*"⁷ and "*it is now clear that electric solutions are squarely on the table, as part of the IRP Framework*".⁸
21. Enbridge Gas also seeks to vary the OEB's direction requiring "*Enbridge Gas to consult with the IRP TWG on a potential second IRP pilot that explores creative solutions that go beyond enhanced incentives for Enbridge Gas's traditional DSM program offerings*" and to report on the progress of that initiative.⁹

⁴ Rules 42.01(a) and 43.01(d); see also [EB-2006-0322/0338/0340 Decision with Reasons on Motions to Review the Natural Gas Electricity Interface Review Decision, May 22, 2007](#), pages 17-18.

⁵ NGEIR Review Motion, pages 17-18.

⁶ Decision, page 5.

⁷ Decision, page 5.

⁸ Decision, page 4.

⁹ Decision, pages 11-12.

22. None of these items set out above were on the Issues List for the SLH IRP Pilot Project proceeding. The SLH IRP Pilot Project proceeding was not intended to review and change the IRP Framework, or to make findings about the role of electrification or gas technologies in IRP or about what broad issues (like alternatives to new connections) should be part of future IRP Pilot Projects.
23. The broad findings made by the Hearing Panel to choose electrification and disallow advanced gas technologies are inconsistent with and out of step with current Ontario government policy. The Ontario government has been clear about the importance of natural gas and customer choice in the province's energy mix.¹⁰ The aspects of the Decision that categorically deny advanced gas technologies and direct all associated IRP investment to electrification are fundamentally at odds with Ontario government policy and recent Ontario government public policy imperatives. The same is true of directions to consider measures such as not connecting new customers in a future IRP Pilot Project. These findings ignore customer choice and are not in keeping with an "all-of-the-above" approach to meeting the province's energy needs as prioritized by the Ontario government.¹¹ They also reflect a mischaracterization of IRP's purpose, shifting it from an economic and planning mechanism for assessing infrastructure alternatives toward a vehicle for fuel preference. OEB decisions must take account of and implement Ontario government policy, rather than conflicting with such policy.¹²
24. Enbridge Gas submits that the OEB's errors in endorsing and favouring electrification as an IRP alternative ("**IRPA**"), and denying any role for advanced gas technologies are material errors. They change the nature of the approved SLH IRP Pilot Project. If not corrected, they risk influencing future decisions in the IRP Framework Review and future IRP plan applications.

¹⁰ [Ontario's Affordable Energy Future: The Pressing Case for More Power | ontario.ca](#), under the headings "Priorities for Natural Gas" and "Integrated energy resource planning". See also [Energy for Generations](#).

¹¹ Energy for Generations, discussed further below, pages 8 -9.

¹² Note that section 2(5) of the [Ontario Energy Board Act, 1998](#) expressly states the OEB's objective "to promote energy conservation and energy efficiency **in accordance with the policies of the Government of Ontario**". (emphasis added)

25. It is not efficient or necessary or appropriate to proceed with another IRP Pilot Project (as directed in the Decision) at this time, while the OEB's IRP Framework Review is underway. It is appropriate to stay that portion of the Decision, to be revisited later in light of the OEB's determinations about the future of IRP and the IRP Framework.

E. REPLY TO INTERVENOR SUBMISSIONS ON THE MERITS OF THE MOTION

26. As set out in the Overview, deference to the IRP Framework Review, and allegations of supposed cost-effectiveness of electrification, are the primary grounds upon which the Responding Submissions are premised. Set out below are Enbridge Gas's reply to these, and the other, positions advanced in the Responding Submissions.

The IRP Framework Review Is Not a Replacement for this Review Motion

27. To varying degrees, all of the Responding Submissions¹³ urge the OEB to decline to address the merits of this Motion in favour of having these matters addressed in the IRP Framework Review. As a preliminary matter, it is important to observe that this proposal is not a defense of the Decision on its merits. OEB staff's position on the Motion, which is solely based on this deferral proposal, is particularly notable.¹⁴

28. OEB staff does not, for instance, identify an evidentiary foundation for the OEB's categorical finding that the OEB "will not approve" IRP pilots that include gas technologies, nor does OEB staff seek to justify the Decision's forward-looking pronouncements about the scope of permissible IRPAs. OEB staff does not engage with whether those determinations were within the Issues List or whether parties had notice that such conclusions might be reached in this proceeding. OEB staff's position is simply about timing and forum, rather than the correctness of the

¹³ See the Submissions dated April 2, 2026 from each of PP (page 2), SEC (page 4, noting that SEC agrees with OEB staff's submissions, but it does not support OEB staff's conclusion that the motion should be dismissed on this basis), BOMA (page 2), and ED (page 1, and also see ED's submissions on the Threshold Question dated February 24, 2026, page 1). See also OEB staff Submissions dated April 1, 2026, pages 2 – 3.

¹⁴ BOMA similarly does not attempt to defend the Decision on its merits.

Decision. Effectively, OEB staff and others are assuming that the revisiting of the problematic parts of the Decision will take place in the IRP Framework Review.

29. Regardless, proceeding in this manner raises additional (but familiar) concerns. The IRP Framework Review cannot retroactively correct defects in the Decision, such as supplying notice that parties never had in the SLH IRP Pilot proceeding, nor can it create an evidentiary record to support the categorical and forward-looking determinations reached in the Decision. Just as the SLH IRP Pilot Project proceeding was ill-suited to address framework level issues, the IRP Framework Review is ill-suited to address the underlying bases for the Review Issues. And the IRP Framework Review will not address how the SLH IRP Pilot Project itself is carried out.
30. If left uncorrected at this stage, the Decision will directly affect how the IRP Framework Review is conducted. This risk of the Decision tainting the IRP Framework Review was set out in detail in Enbridge Gas's reply submissions at the threshold stage, particularly at paragraphs 19 – 26.¹⁵ Given that this item is central to the Responding Submissions, the following paragraphs summarize the Company's position on deferring this matter to the IRP Framework Review.
31. Deferring consideration of the Review Issues to the IRP Framework Review, while leaving the Decision intact, risks distorting that process from the outset. A decision that declares what IRP "will not approve," and does so with immediate operative effect, does not stand alongside a framework review as one consideration among many. It risks functioning as the *de facto* starting point from which the parties, and the OEB, will operate.
32. This is not a hypothetical concern. Parties routinely advance their positions based on past decisions from the OEB, and Commissioners look to past decisions for guidance. SEC, for instance, seeks to support its position on this Motion by relying

¹⁵ See also paras. 13 – 18 regarding the IRP Framework Review generally.

on the OEB's DSM decision in EB-2022-0335¹⁶, which the Decision itself also relied upon to reach its conclusions presently at issue.

33. If left uncorrected, the Decision's conclusions risk being reinforced through repetition and reliance, embedding or expanding upon flawed premises that should instead be corrected now. As noted in the Company's threshold submissions, proceeding in the manner proposed by the other parties will create an "*ad hoc* evolution that can distort a framework proceeding meant to establish consistent policy on a complete record".¹⁷
34. The Decision represents a conflation of framework level policy questions with the adjudication of a project specific pilot. The SLH IRP Pilot Project proceeding was used (improperly in the Company's submission) to make findings on unasked questions about the permissible scope and content of IRP as a matter of OEB policy. If these matters are deferred to the IRP Framework Review, as opposed to correcting the Decision, the OEB risks yet a further conflation that can exacerbate the issue further. Enbridge Gas submits that should not be permitted.

The Cost-Effectiveness Arguments are Misguided

35. ED¹⁸, SEC¹⁹, and PP²⁰ all seek to defend the Decision based on flawed approaches to calculating the cost-effectiveness of electric heat pumps compared to natural gas technologies for the purposes of IRP. For example, their approaches (and the approach referenced by the OEB from a previous DSM proceeding)²¹ excludes consideration of broader electricity system upgrade costs that may be necessary to support increased electrification.
36. ED and SEC in particular narrowly focus on natural gas heat pumps for this argument, but the advanced gas technologies proposed for the SLH IRP Pilot

¹⁶ SEC Submission dated April 2, 2026, page 2.

¹⁷ Enbridge Gas Reply Submission on the Threshold Question, para. 16.

¹⁸ ED's Submission on the Threshold Question dated February 24, 2026, page 2, attached to ED's Submission dated April 2, 2026.

¹⁹ SEC Submission dated April 2, 2026, pages 2 – 3.

²⁰ PP Submission dated April 2, 2026, page 3.

²¹ Decision, page 4.

Project did not rest solely on that single technology.²² Rather, Enbridge Gas proposed, in addition to gas heat pumps, simultaneous hybrid heating and thermal energy storage. The goal of the pilot project is to implement and assess a variety of advanced technologies.

37. Each of these advanced gas technologies address peak demand reduction in different ways and raise different system considerations.²³ By effectively treating gas heat pumps as a stand-in for all gas technologies (seemingly for all time), any cost-effectiveness arguments will be necessarily incomplete and not representative of the evidence, and proposal, that was before the Hearing Panel.
38. These arguments also ignore the reality that governmental policy has changed significantly since the evidence on which the intervenors rely was filed. Most notably, the federal consumer fuel charge has now been reduced to \$0. None of the Responding Submissions address this point.
39. More fundamentally, however, the SLH IRP Pilot project was never designed to identify a “most cost-effective” IRPA. The goal is to test a variety of demand-side IRPAs regarding their impact on reducing peak hour natural gas system demand. Making threshold decisions about which demand-side IRPAs are best is premature and is at odds with the premise of a pilot project.²⁴ The pilot is intended to comprehensively inform the technical and economic evaluation of future system constraints in assessing IRP alternatives against a facility alternative. To exclude technologies at the outset is wholly inconsistent with ensuring a complete assessment and identification of the optimal alternative(s). It may result in system constraints not even reaching the economic evaluation stage where the technical potential is deemed to be insufficient as a result of IRPAs being inappropriately excluded from consideration.

²² The three advanced gas technologies are described and summarized in Enbridge Gas’s Argument-in-Chief in EB-2022-0335, at pages 10 to 11 (which includes citations to the pre-filed evidence).

²³ See, for example, Enbridge Gas Argument-in-Chief, EB-2022-0335, pages 10–11.

²⁴ EB-2022-0335, Enbridge Gas Reply Argument, October 22, 2024, page 7.

40. In any event, the Decision is not premised on a cost-effectiveness analysis. The Decision did not weigh competing technologies, apply an economic test, or conclude that electrification measures should be preferred because they were shown to be more cost-effective on the evidentiary record.
41. Instead, the rationale articulated in the Decision was a policy judgment: incentives for gas equipment are incompatible with IRP because they “continue the need for gas infrastructure and utilization of gas.”²⁵ The Decision expresses a clear view about what IRP should permit in principle, as opposed to an assessment of whether particular technologies may be more or less cost-effective in a given application.
42. Cost-effectiveness arguments – whatever their merits – do not respond to the determinations the Hearing Panel actually made, nor can they retroactively justify those determinations which were always grounded on a fundamentally different premise.²⁶

The Decision is Contrary to Government Policy

43. PP seeks to characterize the Decision as being consistent with government policy. Enbridge Gas disagrees.
44. In *Energy for Generations: Ontario’s Integrated Plan to Power the Strongest Economy in the G7* (the “IEP”), the Ontario government expressly adopted a holistic approach to energy planning. The government is prioritizing affordability, reliability, flexibility, and, perhaps most importantly, customer choice across fuels.²⁷ The IEP repeatedly emphasizes the value of optionality and fuel diversity, expressly confirming an ongoing role for natural gas alongside electricity, storage,

²⁵ Decision, page 5.

²⁶ See also Enbridge Gas’s Reply Submission on the Threshold Question, paras. 30 – 31.

²⁷ See, for example, the IEP, pages 6 – 8 and 14 which states: “Ontario’s approach to affordability centres on the principle of customer choice. Whether heating a home, fueling a vehicle, or powering a business, customers are best positioned to decide which energy solutions work for them – based on their needs, preferences, and budgets.”

hydrogen, and other resources.²⁸ That policy directive reflects a deliberate rejection of categorical fuel preference in favour of maintaining flexibility.

45. The IEP has been formally embedded in the OEB's own adjudicative processes. In January 2026, the OEB's Chief Executive Officer issued a binding policy requiring OEB staff, in all proceedings, to identify and give effect to the relevant portions of the IEP.²⁹
46. Ontario energy policy does not support the categorical exclusion of gas technologies as possible IRPAs. Rather, Chapter 5 of the IEP (Important Role of Natural Gas) expressly notes in this regard: "Because natural gas provides a powerful combination of low cost and high energy density that cannot currently be matched by other energy sources, it is a critical component of Ontario's future energy mix".³⁰
47. The Decision is inconsistent with this policy. PP's defence of the Decision rests on recasting government policy as implicitly favouring electrification over gas, ignoring that doing so would be contrary to the IEP's clear emphasis on choice, balance, and flexibility, as well as the role of natural gas into the future.

Misunderstanding the Nature of the Decision

48. ED argues that Enbridge Gas is merely challenging the OEB's reasons, rather than the underlying order.³¹ The actual Order at issue here says simply that "[t]he direction provided in this Decision and Order is effective immediately".³² This brings in all of the various determinations and findings in the Decision.

²⁸ See, for example, the IEP, Chapter 5 "Important Role of Natural Gas", pages 94 – 97 and Chapter 7 "Integrated Energy Planning" beginning on page 119.

²⁹ Ontario Energy Board (Carolyn Calwell, Chief Executive Officer), [CEO Policy 2026-01 – Regarding Energy for Generations, Ontario's Integrated Plan to Power the Strongest Economy in the G7](#), issued pursuant to s. 13.1 of the *Ontario Energy Board Act, 1998*, January 30, 2026.

³⁰ The IEP, page 95.

³¹ ED Submission dated April 2, 2026, page 1.

³² Decision, page 14.

49. The OEB's categorical finding that it "will not approve"³³ IRP pilots including gas technologies is not incidental reasoning or *obiter dicta*. It is the governing premise of the findings about the current and future roles (and non-roles) for gas technologies and electrification in IRP. The categorical findings in the Decision regarding gas technologies as not being a viable IRPA is the operative determination that underscores, and gives effect to, the Decision.
50. The breadth and nature of the Decision is similarly relevant to another argument advanced by PP.³⁴ PP argues that the exclusion of gas-based IRPAs must have been within the scope of the proceeding because the design of the SLH IRP Pilot Project, which included the potential role of electrification, was clearly in scope.
51. The Issues List permitted consideration of whether limited electrification measures might be tested as part of the SLH IRP Pilot Project. It did not put in issue whether gas-based IRPAs should be excluded as a category, or whether IRP itself should be redefined to rule them out going forward. The mere presence of electrification on the Issues List for a pilot application does not put within scope the categorical, framework level determinations made in the Decision that are presently under review. Those determinations go well beyond assessing the role of electrification as one potential limited-scope IRPA within the SLH IRP Pilot Project.

Any Second Pilot Project Should Await the IRP Framework Review

52. As set out in the Notice of Motion, Enbridge Gas seeks to address the question of any further IRP pilots after the IRP Framework Review is complete. Both PP³⁵ and SEC³⁶ oppose this, though it is notable that SEC had agreed with Enbridge Gas at the threshold stage that "a second pilot should await the [IRP] Framework Review".³⁷ SEC did not provide a rationale for its revised position.

³³ Decision, page 5.

³⁴ PP Submission dated April 2, 2026, pages 2 – 3.

³⁵ PP Submission dated April 2, 2026, pages 4 – 6.

³⁶ SEC Submission dated April 2, 2026, pages 3 – 4.

³⁷ SEC Submission on the Threshold Question dated February 27, 2026, page 4.

53. In any event, the IRP Framework Review is intended to resolve questions about the purpose, scope, and tools of IRP. Designing a second pilot in advance of that clarity risks duplication, re-work, and misalignment with the eventual framework.
54. Similarly, the uncertainty caused by the Decision, as well as its interplay (if any) with the still-outstanding IRP Framework Review, is an example of how an uncertain framework can impact a pilot proceeding. Advancing with a second pilot before the IRP Framework is settled risks repeating the uncertainties, confusion and delays the parties are experiencing as a result of the Decision.
55. Enbridge Gas submits that it is most efficient for the OEB to pause or suspend aspects of the Decision that purport to direct what Enbridge Gas should do in the future for IRP. The direction that Enbridge Gas must consider and report on an additional IRP pilot project³⁸ is not something that needs to be implemented now in order for Enbridge Gas to proceed with implementation of the SLH IRP Pilot Project.

G. REMEDIES AND RELIEF SOUGHT

56. The errors set out in the Notice of Motion and highlighted herein demonstrate that the Decision as it relates to the Review Issues is incorrect and goes beyond the scope of the proceeding and is inconsistent with Ontario government policy.
57. It is fair to conclude that had the original panel of Commissioners properly considered the evidence in the context of the issues properly before them, then they would not have made findings and directions disallowing advanced gas technologies and favouring electrification as IRPAs.
58. Enbridge Gas submits therefore that the Commissioner(s) considering this Review Motion should vary the Decision and approve the SLH IRP Pilot Project budget as filed. As set out in the Notice of Motion³⁹, Enbridge Gas requests that the OEB vary the Decision in relation to the Review Issues to:

³⁸ Decision, pages 11-12.

³⁹ Notice of Motion, para. 3.

- (a) Approve the inclusion of advanced gas technologies in the SLH IRP Pilot Project;
 - (b) Remove the direction to re-allocate the budget for the denied advanced gas technologies to electrification measures;
 - (c) 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; and
 - (d) 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.
59. In the event that there is a finding that the Decision contains errors, but the OEB is not prepared to substitute a new decision as requested, then Enbridge Gas submits that a number of options are available, taking the OEB's broad powers to control its own processes into account. These options include:
- (a) Issuing an amended Decision to permit the SLH IRP Pilot Project to proceed without advanced gas technologies but also without reallocating any amounts to electrification IRPAs. The OEB could then direct that questions about the role of advanced gas technologies and electrification as IRPAs be addressed and determined in the IRP Framework Review; or
 - (b) Returning the consideration of the SLH IRP Pilot Project to a different panel of Commissioners, to rehear the aspects of the original SLH IRP Pilot Project application as related to advanced gas technologies in the context of the issues list and current Ontario government policy.⁴⁰ Enbridge Gas notes that this scenario would present significant timing challenges, as a revised OEB decision would almost certainly not be issued before the SLH IRP Pilot Project is complete. As a result, implementing any amendments to the SLH IRP Pilot Project would become impractical or impossible, without extending the term and costs of the pilot.
60. Finally, in the event that the OEB dismisses this Motion on the basis argued by OEB staff (that it is not efficient to rehear the Review Issues because questions about the role for gas technologies and electrification can be addressed in the IRP Framework Review), then Enbridge Gas requests that the OEB direct that the contested portions of the Decision shall not be relied upon, cited, or treated as precedent by any party, including the OEB, in respect of any such matter(s). That

⁴⁰ Notice of Motion, para. 4.

would be an appropriate and balanced outcome in a case where a Review Motion would have been twice dismissed for reasons of efficiency⁴¹, rather than on the merits. Where the OEB finds that contested portions of the Decision are likely to be definitively addressed in the IRP Framework Review then it is not appropriate that any party should be able to cite and rely upon those contested portions of the Decision to justify their position.

All of which is respectfully submitted this April 10, 2026.



David Stevens
Aird & Berlis LLP
Counsel to Enbridge Gas



Patrick Copeland
Aird & Berlis LLP
Counsel to Enbridge Gas

⁴¹ Recall that this is the reason that the OEB's Review of the EB-2022-0335 Decision on its Own Motion (EB-2025-0124) Motion of the Decision was dismissed in the December 11, 2025 Decision and Order (see page 1).