



**ONTARIO ENERGY BOARD  
MOTION TO REVIEW  
DECISION ON IRP FRAMEWORK**

**PROCEDURAL ORDER NO. 1  
October 6, 2025**

On March 27, 2025, the Ontario Energy Board (OEB) issued a notice of review on its own motion (the Review) to reconsider the Decision and Order in EB-2022-0335, issued on the same date (the Decision).

The Review will be heard by commissioners: Fred Cass (presiding), Allison Duff, David Sword, Vinay Sharma, and Shahrzad Rahbar.

### **Background**

In 2021, the OEB established an Integrated Resource Planning (IRP) Framework to guide Enbridge Gas Inc. (Enbridge Gas) in considering integrated resource planning alternatives (IRPAs) to traditional pipeline infrastructure for meeting its natural gas system needs.

In July 2023, Enbridge Gas applied to the OEB for approval of two IRP pilot projects. One of the projects was later withdrawn, and the location and scope of the remaining pilot project (the IRP Pilot) were modified.

The Decision approved the IRP Pilot with certain modifications. Specifically, the OEB did not approve funding for incentives related to natural gas equipment, finding that such incentives were inconsistent with the purpose of an IRP, which has, as part of its objectives, the avoidance of natural gas infrastructure where there were economic alternatives.

Instead, it ordered that \$1.5 million be reallocated to support Limited Electrification Measures, including cold climate Air Source Heat Pumps (ccASHPs), Ground Source Heat Pumps (GSHPs), and potentially other technologies such as combined water/space heating systems.

## Motion to Review

The Review notice identified the following three questions:

1. By requiring the use of electricity-based IRPAs and/or excluding funding for gas-fired technologies, did the Decision alter the IRP Framework improperly, without notice to parties or providing them a full opportunity to address the issue during the hearing?
2. Was there sufficient evidence to support the categorical exclusion of funding for gas-fired technologies in the IRP Pilot?
3. In assessing the cost-effectiveness of electric heat pumps versus gas-fired heat pumps—which formed part of the rationale for denying gas-fired heat pump funding—was there sufficient evidence of, and did the Decision adequately consider, the potential cost of any required electricity system upgrades?

## Scope of Review

The Decision approved the IRP Pilot, which included four initiatives:

1. Enhanced targeted energy efficiency measures via demand-side management (DSM) programs.
2. Demand response programming.
3. Limited electrification offerings (ccASHPs and GSHPs).
4. Advanced technology offerings (hybrid heating, natural gas heat pumps, thermal energy storage).

The total approved budget for the IRP Pilot was \$14.2 million.

The Review is narrowly focused on Initiative #4, specifically the exclusion of gas equipment and the associated \$1.5 million reallocation from gas-based technologies to electrification measures.

The OEB acknowledges unsolicited letters received after the Review notice was issued. Some of these letters commented on the scope of the Review and made suggestions. The OEB will not expand the scope beyond what is outlined in the Review notice. The OEB will not do so for two reasons:

- the Review concerns only the exclusion of gas equipment and the subsequent reallocation of funds between initiatives, not the total approved budget for the IRP Pilot.
- a Review initiated by the OEB is a different process, governed by certain procedural rules (notably Rule 41.01), compared to a review motion initiated by a party governed by procedural Rules 40, 42 and 43.01-43.02.

The OEB also acknowledges that, while parties may have considered filing motions to review the Decision with a different scope and on different grounds, the 20-day period for doing so has passed. Given the unique circumstances of this proceeding, if someone files a motion to review arising from the Decision, it would be reasonable for the OEB to consider starting the 20-day period on the day that the OEB renders its decision on the Review.

## Review Hearing

There has been a significant passage of time since the Review notice was filed in March. The OEB notes that the three questions identified in the Review notice appear to be predicated on issues that can be or will be raised in other ongoing OEB proceedings initiated mostly after the Review was filed (e.g. consultation on the OEB's IRP framework<sup>1</sup>, extending Enbridge Gas's existing DSM framework in 2026<sup>2</sup>, Enbridge Gas's Phase 3 rebasing<sup>3</sup>). The OEB seeks to understand how these OEB proceedings could affect the hearing of this Review, considering adjudicative effectiveness and efficiency.

The OEB invites submissions from parties on the following preliminary question: Is there still merit in proceeding with the Review and addressing the three questions posed in the Review notice?

The OEB also invites parties to address, in their submissions, whether proceeding with the Review to determine the three questions set out above is likely to result in the most just, expeditious, and efficient determination of matters before the OEB.

The OEB notes that Enbridge Gas may seek approval for additional IRP pilot programs at any time, including ones similar to the IRP Pilot. The Review does not prevent Enbridge Gas from proceeding with most IRP alternatives included in the IRP Pilot. The

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<sup>1</sup> EB-2025-0125

<sup>2</sup> EB-2024-0198

<sup>3</sup> EB-2025-0064, Issue #13

Review is limited to the \$1.5 million funding reallocation from gas-based technologies to electrification offerings.

The public record of evidence and submissions in EB-2022-0335 is adopted for this proceeding. The OEB approves all parties of record in EB-2022-0335 as parties in this proceeding. Intervenors granted cost eligibility status in EB-2022-0335 are eligible to apply for an award of costs for their participation in this Review. The OEB seeks meaningful, relevant submissions within the scope of the preliminary question set out above. Cost eligible intervenors may apply for a cost award of up to 5 hours for submissions on the preliminary question.

After reviewing the submissions on the preliminary question, the OEB will decide what, if any, further procedural steps are needed.

### THE ONTARIO ENERGY BOARD ORDERS THAT:

1. All parties of record in EB-2022-0335 and OEB staff shall file with the OEB, copying all other parties, any submissions on the preliminary question by, **October 27, 2025**.

Parties are responsible for ensuring that any documents they file with the OEB, such as applicant and intervenor evidence, interrogatories and responses to interrogatories or any other type of document, **do not include personal information** (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's [Rules of Practice and Procedure](#).

Please quote file number, **EB-2025-0124** for all materials filed and submit them in searchable/unrestricted PDF format with a digital signature through the [OEB's online filing portal](#).

- Filings should clearly state the sender's name, postal address, telephone number and e-mail address.
- Please use the document naming conventions and document submission standards outlined in the [Regulatory Electronic Submission System \(RESS\) Document Guidelines](#) found at the [File documents online page](#) on the OEB's website.
- Parties are encouraged to use RESS. Those who have not yet [set up an account](#), or require assistance using the online filing portal can contact [registrar@oeb.ca](mailto:registrar@oeb.ca) for assistance.
- Cost claims are filed through the OEB's online filing portal. Please visit the [File documents online page](#) of the OEB's website for more information. All

participants shall download a copy of their submitted cost claim and serve it on all required parties as per the [Practice Direction on Cost Awards](#).

All communications should be directed to the attention of the Registrar and be received by 4:45 p.m., on the required date.

With respect to distribution lists for all electronic correspondence and materials related to this proceeding, parties must include the Case Manager, Stephanie Cheng at [stephanie.cheng@oeb.ca](mailto:stephanie.cheng@oeb.ca) and OEB Counsel, Lawren Murray at [lawren.murray@oeb.ca](mailto:lawren.murray@oeb.ca).

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**DATED** at Toronto, **October 6, 2025**

**ONTARIO ENERGY BOARD**

***By Delegation Before:***

Ritchie Murray  
Acting Registrar