

Feedback Form

2025 Annual Planning Outlook – May 21, 2025

Feedback Provided by:

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Date: June 4, 2025

To promote transparency, feedback submitted will be posted on the [2025 Annual Planning Outlook](#) engagement page unless otherwise requested by the sender.

- ☐ **Yes – there is confidential information, do not post**
☒ **No – comfortable to publish to the IESO web page**

Following the **May 21** engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the [2025 Annual Planning Outlook](#).

Note: The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials please indicate if they are confidential.

Please submit feedback to engagement@ieso.ca by **June 4.**

General Comments/Feedback

Do you have any general comments or feedback regarding the information shared or recommendations for the IESO to consider regarding future outlooks?

The IESO's Annual Planning Outlook (APO) for 2025 presents an important opportunity for stakeholders across the energy sector to understand and prepare for the evolving landscape of energy generation and distribution in Ontario. Enbridge Gas looks to IESO's APO to understand the electricity system direction and planning assumptions to better understand the nature and pace of electrification in IESO's system planning, a lower-emission and diversified energy system, incorporating new energy technologies over time. Ontarians expect – and deserve – access to reliable, resilient, and affordable energy systems.

Enbridge Gas appreciates the IESO's efforts in incorporating feedback on 2024 APO into the 2025 APO. These additions increase the transparency and usability of the information presented in the 2025 APO. Enbridge Gas appreciates the opportunity to comment on the IESO's APO 2025 and offers the following feedback:

- **Adapting Future Outlooks Amid Policy Changes**

Enbridge Gas is interested to see how the IESO adjusts future outlooks in light of legislative and regulatory changes such as Bill 17 and the implementation of Canada's Clean Energy Regulations (CER). Enbridge acknowledges that it was noted in the webinar that the IESO will continue to monitor the implications of policy changes. It would be helpful for the IESO to include detailed information on how policy changes are being monitored and considered in demand forecasts in the next iteration of the APO.

- **Long-Term Forecasting and Natural Gas Capacity Considerations**

The IESO forecasts ~6,000 MW to ~7,800 MW of potential generation capacity from natural gas to the year 2040 (Figure 29, Remaining Capacity Needs and Future Procurements and Programs Required), whereas much of the rest of APO looks out to 2050. Given that the federal CER (if implemented as planned) would limit production from most of the gas fleet, particularly when their contracts expire, it would be helpful for the IESO to provide a forecast out to 2050 or to the end of the outlook period in the next iteration of the APO. In addition, it would be helpful for the IESO to provide a sense of the potential contributions to annual energy and peak for the outlook period as well. In addition, where policies such as the CER are impacting the use of gas fired generation, the IESO should be clear on what generation technologies are being used to fill the role currently provided by gas fired generation, namely dispatchable peaking services, and analysis on the impact of this change on the reliability and resiliency of the electricity system.

- **Integrating Regional Planning into Future APOs**

Enbridge actively participates in the IESO's Regional Planning Process, by attending public webinars and providing feedback when invited to do so. However, it is unclear how the information gathered during the regional planning process is applied and/or considered in future APOs. Enbridge Gas suggests that clarity be provided on how demand scenarios developed in IESO's Regional Planning Process are factored into future APOs.

- **Collaborating on Heating Electrification Research**

Enbridge notes the IESO plans to author a series of technical papers that explore areas of long-term demand uncertainty, which are intended to enhance sector understanding of critical areas and identify potential implications and opportunities for system planning. Enbridge Gas would welcome the opportunity to collaborate with the IESO on its upcoming heating electrification technical paper, which would also support the provincial objectives of integrated energy planning.

- **Demand Uncertainties & Indicators**

In Section 7 (Demand Uncertainties), the IESO lists several uncertainties related to demand and supply. It would be beneficial for the IESO to include in a future APO the indicators that the IESO is monitoring to confirm that the demand forecast is unfolding as predicted. What developments does the IESO anticipate across various sectors? For example, regulatory support and government policies that would support a particular technology, or market demand and consumer preferences.

As the IESO acknowledges in the APO, system demand forecasting carries uncertainties, particularly as projections extend further into the future amidst the ongoing energy transition. Enbridge Gas respectfully requests the above-noted information be provided in future APOs to provide further clarity and certainty (where possible) for potential consideration in natural gas system planning. Through coordinated system planning efforts, whereby key inputs and assumptions are known and shared between energy system planners like IESO and Enbridge Gas, more robust energy system planning and capital investment decisions can be made to support a reliable, resilient, and cost-effective energy system in Ontario.