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Framework for the Assessment of Distributor Gas Supply Plans

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Table of Contents

1. INTRODUCTION.....	4
2. GUIDING PRINCIPLES AND EVALUATION CRITERIA	5
2.1 Guiding Principles for the Assessment of Gas Supply Plans.....	5
2.2 Framework Criteria	6
2.2.1 Demand Forecast Analysis	6
2.2.2 Supply Option Analysis.....	6
2.2.3 Risk Mitigation Analysis.....	7
2.2.4 Achieving Public Policy Objectives	8
2.2.5 Procurement Process and Policy Analysis.....	8
2.2.6 Performance Measurement	9
3. GAS SUPPLY PLAN REVIEW PROCESS.....	10
3.1 Five-Year Gas Supply Plan Submission	10
3.2 Annual Gas Supply Plan Updates.....	10
3.2.1 Stakeholder Engagement.....	11
3.2.2 Staff Report to the OEB.....	12
4. LINKS TO OTHER APPLICATIONS	13
4.1 QRAM.....	13
4.2 Leave to Construct.....	13
4.3 Long-Term Contracts.....	13
4.4 Rate Applications.....	13
5. MONITORING THE FRAMEWORK IN MEETING THE OEB’S OBJECTIVES	14
APPENDIX.....	15
1. FIVE-YEAR GAS SUPPLY PLAN REQUIREMENTS	15
1.1 Administrative Information	15
1.2 Gas Supply Plan Criteria.....	16
1.3 Gas Supply Plan Outlook.....	17
1.4 Gas Supply Plan Execution	18
1.5 Description of Continuous Improvement Strategies	18
1.6 Link to Other Applications.....	18
1.7 Three-Year Historical Review	18
2. ANNUAL GAS SUPPLY PLAN UPDATE REQUIREMENTS.....	18
2.1 Significant Changes to the Gas Supply Plan	18

2.2	Updated Gas Supply Plan Outlook	19
2.3	Three-Year Historical Review	19

1. Introduction

The Ontario Energy Board's (OEB) Framework for the Assessment of Distributor Gas Supply Plans (Framework) sets out the OEB's approach to assessing a natural gas distributor's gas supply plans. The Framework identifies three guiding principles that the OEB uses in assessing gas supply plans: cost effectiveness, reliability (including security of supply), and support for public policy. The Framework also outlines the information required to assess whether gas supply plans appropriately balance these principles and deliver value to customers.

The Framework was originally issued on October 25, 2018 in a Report of the OEB,¹ following an OEB consultation to update its regulatory approach to the gas supply planning process.

The OEB has updated the Framework to reflect the findings in the OEB's Decision and Order on Enbridge Gas's 5-year Gas Supply Plan² and requirements from Ontario's Integrated Energy Plan.³

The key updates include:

- New filing requirements to incorporate multiple demand scenarios arising from Ontario's Integrated Energy Plan (See Appendix, Section 1. Five-Year Gas Supply Plan Requirements)
- Amendments to the OEB's assessment of plans to reflect that five-year gas supply plans will be filed and reviewed in distributor rebasing applications (See Section 3. Gas Supply Plan Review Process)
- Reviews of annual updates will only be required where there are significant changes from the approved five-year gas supply plan (See Section 3. Gas Supply Plan Review Process)
- Modernization of the Framework through the removal of outdated historical context from the 2018 Report of the OEB

This Framework supersedes the 2018 Report of the OEB and serves as the OEB's updated Framework for the Assessment of Distributor Gas Supply Plans.

¹ EB-2017-0129, Report of the OEB, October 25, 2018

² EB-2025-0065, Decision and Order, May 21, 2026

³ [Energy for Generations](#) and Minister of Energy and Mines June 11, 2025 directive to the OEB, [OC-802-2025.pdf](#)

2. Guiding Principles and Evaluation Criteria

The Framework allows for greater transparency, accountability and performance measurement to the review of gas supply plans to ensure that customers are receiving value from a distributor's gas supply activities. The Framework builds on the OEB's prior experience assessing gas supply plans through adjudicative proceedings and consultations on gas supply plan updates.

The approach set out in the Framework ensures transparency by requiring distributors to publicly file a comprehensive five-year gas supply plan once every five years and annual updates. The assessment process provides customers and other stakeholders the opportunity to file comments with respect to the gas supply plans. In addition, clearly defined principles are established that the OEB applies in the assessment of the gas supply plans, which ensures that both customers and the distributors understand how the gas supply plans are considered.

Distributors maintain responsibility to develop and execute their gas supply plans and are accountable for the outcome. To this end, performance metrics assist the OEB in assessing whether the gas supply plans are achieving the Framework's guiding principles. The Framework places a greater emphasis on the customer impact of the gas supply decisions that are made on their behalf. This includes an assessment of costs, risks and volatility of the plan.

2.1 Guiding Principles for the Assessment of Gas Supply Plans

The OEB is of the view that a principle-based approach to gas supply planning is an effective means of guiding a distributor's approach to developing a gas supply plan that is consistent with the outcomes customers desire. In assessing a gas supply plan, the OEB focuses on determining whether or not a distributor has successfully balanced all of the guiding principles. Guiding principles also help provide consistency, clarity and predictability in the OEB's assessment of the plans.

The OEB has defined guiding principles that are consistent with its legislated mandate to protect the interests of customers with respect to price and the reliability of gas service. The guiding principles for a distributor's gas supply plan are to deliver gas supply that is cost-effective, reliable (secure) and achieves public policy objectives.

- 1) Cost-effectiveness – The gas supply plans will be cost-effective. Cost-effectiveness is achieved by appropriately balancing the principles and in executing the supply plan in an economically efficient manner.
- 2) Reliability and security of supply – The gas supply plans will ensure the reliable and secure supply of gas. Reliability and security of supply is achieved by ensuring gas supply to various receipt points to meet planned peak day and seasonal gas delivery requirements.

- 3) Public policy – The gas supply plan will be developed to ensure that it supports and is aligned with public policy where appropriate.

For clarity, cost-effectiveness does not necessarily mean the “lowest cost,” reliability does not mean “reliable at any cost” and support for public policy does not mean “support at any cost” or “any level of reliability.” Rather, the intent is to strike a balanced approach to the benefit of customers. Distributors are required to demonstrate that their gas supply plans balance the principles in a way that is prudent and appropriate for customers. It is expected that distributors will employ strategies that clearly describe their approach, customer impacts and risks associated with both the options considered and chosen to deliver value to customers.

2.2 Framework Criteria

The information requirements set out below are used by the OEB to evaluate a distributor’s plan to assess whether it meets the principles and delivers value to consumers. Gas distributor’s plans must meet specific criteria established by the OEB and the gas supply plan should include a description of how the criteria have been met.

2.2.1 Demand Forecast Analysis

The development of demand forecasts is the starting point for gas supply planning. Distributors prepare demand forecasts so that they can determine the appropriate portfolio of transportation and storage assets required to meet customer demand. Distributors use these forecasts to inform the development of their plans and also for the purposes of cost allocation and rate-setting.

As part of the review of a gas supply plan, the OEB assesses whether the distributor has demonstrated they have considered the appropriate factors that could impact the demand forecasts. In presenting their demand forecasts, distributors should describe the process they undertake to develop the forecast and describe the associated risks with their approach. For example, distributors should describe factors such as historical demand, customer demographic trends, changing weather patterns and how they impact the forecast. In its assessment of the gas supply plan, the OEB considers whether the distributors have appropriately supported their decision and incorporated an understanding of current and future trends. A detailed description of this along with a rationale that supports their approach assists the OEB in understanding how distributors undertake this task and the potential customer impact.

2.2.2 Supply Option Analysis

The OEB assesses whether the distributor has demonstrated that their gas supply plan balances cost with the other outcomes described in the guiding principles. The gas supply plan describes the options that were considered and how the selected option was determined. The description must include an analysis of the landed cost and bill impact(s) of the options examined, identify the risk associated with each option and how the options align with the guiding principles. This approach applies to the development of the distributor’s transportation, storage and supply strategies within the gas supply plan.

To effectively demonstrate that the plans have considered a variety of options, best- and worst-case scenarios and their impact on customers, distributors must provide information that supports their planning decisions. This includes, but is not limited to, the following:

- A description of a forecast that outlines the current market conditions in Ontario and North America (Market Outlook) at the outset of gas supply planning to provide context for the decisions that distributors make.
- A description of the costs associated with the various options considered and how the final option(s) was/were selected.
- Analysis of the bill impacts of options considered and how these compare to the selected option(s), including a description of the considerations used to determine the final plan.
- A description of how the options considered the impact of price volatility as a result of various supply/demand scenarios and how the distributor determined what level of volatility was deemed acceptable for customers.
- A description of the various options considered to deliver reliable supply to customers and why the final option(s) was/were chosen.
- A description of the distributor's approach to balancing reliability and flexibility (including planned discretionary supply) within its plan and the cost and risk trade-offs associated with their approach.
- A description of how the distributor built supply and transportation route diversity into the plan and the cost implications and risks associated with their approach.

An expected outcome for the gas supply plan is that it provides the flexibility to respond to changing market conditions while balancing cost-effectiveness and maintaining reliability of supply. One of the ways distributors have historically done this is to procure less supply than they have contracted pipeline capacity to ship. This provides the distributor with an opportunity to sell capacity or procure supply to meet demand and changes in requirements. The gas supply plan must describe how the distributor has determined these quantities and identify the risks associated with their approach along with the impact on customers, including the costs associated with underutilized assets.

The analysis of supply options also provides the distributor with the opportunity to identify and assess new or alternative sources of supply. Building this new supply into its plan may require the distributor to expand on areas such as supply development, flexibility and value to customers.

2.2.3 Risk Mitigation Analysis

Distributors develop a gas supply plan that supports the needs of its customers as identified through the demand forecast, and in doing so also manages both the cost and reliability-related risks on behalf of their customers. Increased reliability may cost more and distributors are expected to determine the appropriate balance. Distributors must articulate their approach by including a suite of scenarios that describe the envelope of plan forecasts based on worst, best and most likely cases, in addition to their selected option(s). This accompanied by commensurate price forecasts for customers can describe the range of realistic outcomes. By describing the potential causal events that

would lead to those outcomes, the OEB will be in a better position to understand the implications of the plan, its flexibility and impacts.

Under the Framework, the gas supply plans have to provide a clear description of the risk management process (identification and mitigation) and an assessment of the risk/cost trade-off implications for customers that are associated with options examined. This includes, but is not limited to, a description of how the distributors' plans address demand forecast variability and price volatility. Gas supply planning strategies should be flexible so that they can adapt to changing market conditions and customer demand in both the short-term and long-term. Gas supply planning should also minimize risk by diversifying contract terms, supply basins and upstream pipelines, and other strategies designed to maintain a viable gas industry in Ontario. This information assists the OEB in assessing the differences in risk profiles for the various options as well as for the respective distributors. The OEB assesses the distributor's approach to managing risk to determine if the approach is reasonable and in line with customer expectations.

2.2.4 Achieving Public Policy Objectives

Distributors must identify and demonstrate the public policy that their gas supply plan is supporting and how they have balanced achieving this with the other guiding principles in this Framework. They should be public policy initiatives that are in effect rather than proposed public policy initiatives.

2.2.5 Procurement Process and Policy Analysis

Once the transportation and storage strategies have been established, the execution of the gas supply plan is based on a distributor's respective gas procurement policies. The gas supply plan must include an overview of these policies along with a description of how the distributor monitors the market and what resources are applied to ensure that it meets demand.

In addition, distributors should describe the "triggers" and other considerations that require it to take action (e.g., sell/procure more gas, sell/procure transportation, curtailment or storage), the options available and the risks associated with their approach, along with the impact on customers. Distributors should be mindful that a description of triggering events does not impact the markets and therefore negatively impact customers.

Distributors need to provide a robust description of the internal processes and level of expertise associated with developing, reviewing, approving and executing the gas supply plan. For example, distributors in the past have used consultants to provide market forecasts and analysis that were used to inform their plans. Distributors should provide a description of the work completed by third parties and how their work is considered when developing the gas supply plan.

2.2.6 Performance Measurement

It is expected that a distributor develops performance metrics that reflect the criteria the OEB has established to demonstrate how the principles have been achieved. The measures should demonstrate the value proposition for customers and how it balanced the Framework's guiding principles. Effective metrics allow the OEB to focus its assessment on results that deliver value for customers and not a line-by-line review of expenditures.

Distributor performance metrics should link directly to one or more of the gas supply plan criteria and be chosen to illustrate the benefits expected from the gas supply planning decisions the distributor has made. Performance metrics are generally quantitative measures used to assess whether the principles have been achieved. However, qualitative measures, such as increased reliability, may also be considered. Performance metrics ensure that the outcomes are measurable in keeping with one of the objectives of the Framework.

In reviewing a distributor's performance metrics, the OEB's considerations are:

- A focus on strategy and results, not activities.
- Demonstration that distributors consider opportunities for continuous improvement in their planning.
- Demonstration of value to customers.
- Performance metrics that accurately measure whether the plans are cost-effective and reliable and support public policy.

The performance metrics of the gas supply plans should reflect the Market Outlook and the critical elements of the plan that the distributor intends to use to meet its demand requirements. At a minimum, distributors should use the Market Outlook section of their gas supply plans as the basis for developing performance metrics. The Framework's filing requirements provide more information about what is to be included in the outlook.

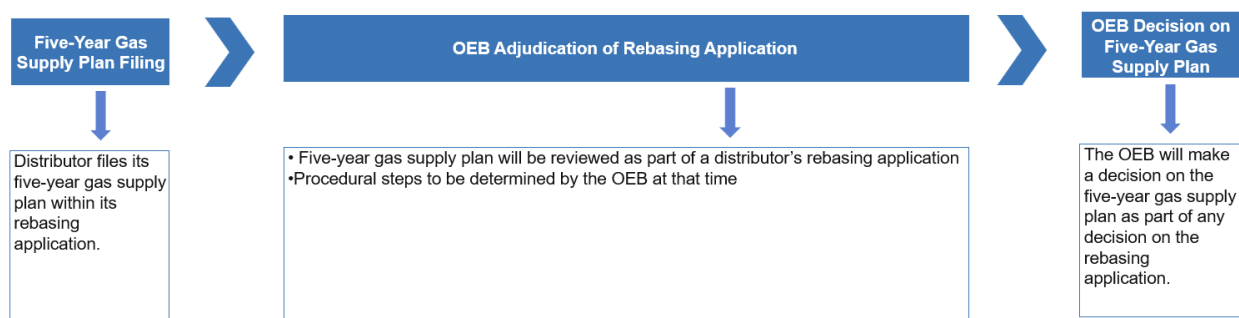
3. Gas Supply Plan Review Process

The Framework outlines a process for the review of a distributor's five-year gas supply plan and annual updates that maintains formal OEB oversight, where necessary, while promoting regulatory efficiency. Given the importance of gas supply-related costs to natural gas customers, the process must ensure adequate participation and engagement. Gas supply plans play an important role in a number of different OEB processes, discussed further below. Therefore, it is important to consider how the process for the review of the plans can contribute to these other proceedings to deliver greater value to customers.

3.1 Five-Year Gas Supply Plan Submission

The OEB requires distributors to file a five-year gas supply plan for review as part of their rebasing application. Reasonable accommodations may be made to address differences between the calendar timings of each, while maintaining the alignment of the gas supply plan review within rebasing. The alignment of a gas supply plan review within rebasing allows the OEB to consider key gas supply planning elements – such as demand forecasting methodologies, design day criteria, storage parameters, and load balancing – within a single, integrated evidentiary record. This approach promotes regulatory efficiency while maintaining formal OEB oversight of a critical planning document.

A five-year planning horizon provides an appropriate period for a robust review of the gas supply plans because it generally aligns with the rebasing term and allows for an efficient use of resources for all stakeholders. The OEB will assess the five-year gas supply plan using the guiding principles and criteria set out in this Framework. The following diagram sets out the general process for a distributor's five-year gas supply plan filing.



3.2 Annual Gas Supply Plan Updates

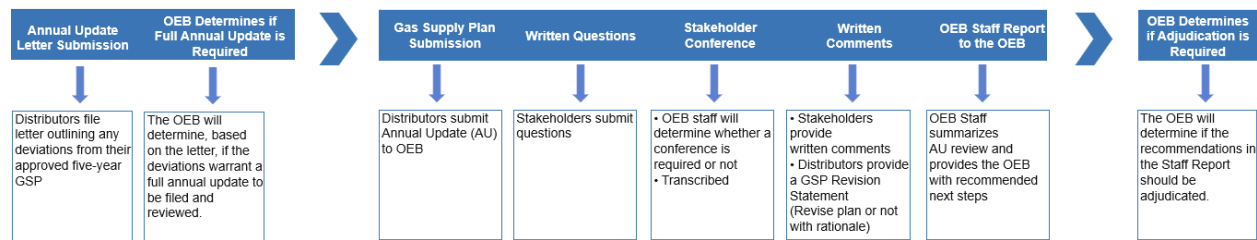
During the annual update years, distributors must file a letter identifying any deviations from the previous gas supply plan that underpinned the OEB's most recent rebasing rate order ("the approved gas supply plan"). Based upon that filing, the OEB will determine whether further review is required. A review will only occur where there are significant changes from the approved five-year gas supply plan. In years without

significant changes, an annual update will not be required, and no consultation or additional processes will be undertaken. A significant change is one related to key areas in the gas supply planning elements – such as demand forecasting methodologies, design day criteria, transportation routes, storage parameters, and load balancing.

The annual gas supply plan update is an important tool for distributors to identify significant events that result in a change to the approved five-year gas supply plans. They will primarily focus on updates to the Outlook section of the gas supply plan, a description of significant changes from previous updates and a historical comparison of actuals to the Outlook.

The timing of the update and potential review may be co-ordinated with other related applications from the distributor.

The review process of an annual gas supply plan update differs from the review process of a five-year gas supply plan. Where the OEB determines that further review of an annual update is warranted, the update will be reviewed through an OEB staff-led consultation process. The following diagram sets out the consultation process for a distributor's annual update.



3.2.1 Stakeholder Engagement

If an annual update is required, distributors will submit their annual update to the OEB in accordance with the timing to be established by the OEB. The OEB will provide stakeholders with the opportunity to submit written questions about the plan prior to the stakeholder conference and final written comments after the conference. The stakeholder conference will be transcribed and will provide an opportunity for the distributor to present its plan and address questions from stakeholders about the manner in which the guiding principles are achieved. All material will be posted on the OEB's website.

The OEB also expects Enbridge Gas to use the Indigenous Working Group as the forum for early and ongoing engagement and information-sharing with Indigenous peoples on gas supply planning.

Distributors, based on feedback received from the stakeholders and OEB staff, may choose to provide written comments or revise their plans after the stakeholder conference. Distributors will provide a gas supply plan revision statement that describes

the plan revisions with supporting rationale underpinning their decision.

3.2.2 Staff Report to the OEB

OEB staff will prepare a report to the OEB providing its assessment of the plan. The OEB staff report will be informed by the stakeholder conference and written submissions. Following consideration of the OEB staff report, the OEB may determine that a proceeding is required to address specific issues highlighted by the staff report. Unless the OEB decides to hold a proceeding to consider the distributor's plan, the annual update review process would end with the OEB staff report.

4. Links to other Applications

The OEB expects that information provided in the gas supply plan will be used to inform other gas supply-related applications submitted to the OEB. The gas supply plan assessment under the Framework is expected to provide for greater efficiency in these other related application processes. Distributors retain the responsibility to support their gas supply plans in these other applications in a manner that promotes regulatory efficiency and avoids duplication and overlap.

4.1 QRAM

The gas supply plan describes the most likely outcome and cost envelope (best/worst case) of the distributor's planning activities over a five-year forecast period. In addition, the gas supply plans include a comparison of actuals with what was forecast for the previous three years. This provides a baseline for assessing actual costs compared to forecasted costs and the impact on customers' rates.

4.2 Leave to Construct

In some cases, leave to construct applications are centered on improving cost effectiveness/reliability for customers. The gas supply plan provides distributors with a consistent mechanism to demonstrate how some specific types of projects will deliver value to customers and can be used to measure the impact over time to determine if the distributor's assessment of benefit was accurate. In addition, the gas supply plan can highlight the need for additional facilities to support demand and provides a link to the distributor's Utility System Plan.

4.3 Long-Term Contracts

Applications for pre-approval of long-term contracts often focus on the value to customers in terms of cost, reliability and public policy. The gas supply plan provides a mechanism for the distributor to demonstrate the value to customers of the proposed long-term contract and the ability to measure the outcome over time.

4.4 Rate Applications

As discussed earlier, a distributor's rate application has or may have an impact on gas supply, transportation and storage rates. The gas supply plan offers a consistent basis to demonstrate how the distributor's gas supply plan and decisions may affect rate applications, including capital plans for new facilities. As noted in section 3.1, distributors must submit a five-year gas supply plan for review within a distributor's rebasing application, subject to reasonable accommodations for differences between the calendar timings of each.

5. Monitoring the Framework in meeting the OEB's Objectives

The OEB expects that over time, experience and lessons learned will provide insight into aspects of the Framework that can be further enhanced and strengthened.

The OEB will monitor, evaluate and report, on an as needed basis, on whether the expected policy outcomes for the Framework are being met over time.

Appendix

Filing Requirements – Distributor Gas Supply Plans

These Filing Requirements are intended to assist distributors in preparing their gas supply plans in order to align with the OEB's Framework. The guidelines outline the minimum information necessary to be filed by gas distributors in order for the OEB to review their gas supply plans and gas supply plan updates.

These requirements provide direction to the distributors on the content of their plans. The requirements should be read in conjunction with the other sections of the Framework to fully understand the intention behind the requirements.

The plans and updates are to be submitted to the OEB by deadlines established by the OEB. The minimum information that distributors must include with their gas supply plans is outlined in this section.

The OEB requires distributors to file a five-year gas supply plan for review as part of their rebasing application, subject to reasonable accommodations for differences between the calendar timings of each. For example, where the timing of the five-year gas supply plan does not align with the initial filing of the rebasing application, a distributor may file an update to its rebasing application during the proceeding to include its five-year gas supply plan.

During the annual update years, distributors must file a letter identifying any deviations from the approved five-year gas supply plan. Based upon that filing, the OEB will determine whether further review is required. A review will only occur where there are significant changes from the approved five-year gas supply plan.

1. Five-Year Gas Supply Plan Requirements

1.1 Administrative Information

- Table of Contents
- Introduction – The introduction should include a summary of the objectives of the plan and, at a high level, how the plan achieves the Framework's guiding principles.
- Significant Changes – To facilitate a more efficient review of the plans, distributors will describe the significant changes to the plan from the previously approved five-year plan and the resulting customer impact.
- Process, Resources and Governance – Distributors will provide a description of the internal processes and level of expertise associated with developing,

reviewing, approving and executing the gas supply plan. For example, distributors in the past have used consultants to provide market forecasts and analysis that were used to inform their plans. Distributors should provide a description of the work completed by third parties and how their work is considered when developing the gas supply plan.

1.2 Gas Supply Plan Criteria

Include a description of the following gas supply plan criteria:

- 1) Demand forecast analysis
- 2) Supply option analysis
- 3) Performance metrics
- 4) Risk mitigation analysis
- 5) Achieving public policy
- 6) Procurement process and policy

The plans shall focus on both the risk and impact to the customers. To effectively demonstrate that the plans have considered a variety of options and their impact on customers, distributors will provide information that supports their planning decisions. This will include, but not be limited to, the following:

- A detailed description of the process they undertake to develop the demand forecast and describe the associated risks with their approach.
- A detailed description of the rationale that supports their approach to developing their demand forecast, the options considered and their impacts on customers.
- A description of the costs associated with the various options considered and how the final option(s) was/were chosen.
- Analysis of the bill impact of options considered and how these compare to the chosen option(s), including a description of the considerations used in determining the final solution.
- A description of how the options considered (and chosen) impact price volatility and predictability and how the distributor determined what level of volatility was deemed acceptable for customers.
- A description of the various options considered to deliver reliable supply to customers and why the final option(s) was/were chosen.
- A description of the distributor's approach to balancing reliability and flexibility within a plan and what the cost and risk trade-offs are associated with their approach.
- A description of how the distributor built supply and transportation route diversity into the plan and what the cost implications and risks are associated with their approach.

Distributors shall incorporate the following additional requirements in gas supply plans

filed⁴ after April 1, 2027⁵:

- Multiple demand scenarios, which include⁶:
 - A reference case for demand that reflects current trends and policies in electrification of transportation, industry, and other areas that impact electricity and natural gas, along with both high and low demand scenarios that reflect reasonable incremental increases or decreases in demand with appropriate and substantiated assumptions.
 - A description of how future average, minimum, and maximum temperatures are incorporated into demand modelling.
 - A description of how economic growth projections, such as employment, population and housing are incorporated into demand modelling.
 - Qualitative and quantitative risk and uncertainty assessments, as appropriate, for each of the scenarios.
- A description of how planning frameworks have considered cost projections for future investments that reflect reasonable assumptions for cost trends, where appropriate.

Where pertinent and practical, if a system investment, policy, or program is intended to facilitate fuel switching, consideration of costs and benefits across impacted energy systems.

1.3 Gas Supply Plan Outlook

The performance metrics of the gas supply plans shall provide a quantitative forecast, or Outlook, of the following outputs of the plan that the distributor plans to use to meet its demand requirements. The performance metrics shall describe how the plan is performing versus the forecast and should be meaningful to customers. At minimum, the Outlook section of the gas supply plan shall include the following:

- Forecasted demand
- Commodity and other market-based solutions portfolio
- Renewable natural gas portfolio
- Transportation portfolio
- Storage portfolio
- Unutilized capacity
- Long-term contracts

⁴ Where this information is included elsewhere in the evidence, a cross-reference can be provided.

⁵ These requirements are per the Minister of Energy and Mines June 11, 2025, directive to the OEB. [OC-802-2025.pdf](#)

⁶ For clarity, where existing modelling of scenarios already meet or exceed the requirement, no additional action is required. Natural gas distributors may use modelling done by others to satisfy the requirement to assess multiple scenarios.

- Other solutions that the distributor determines will be used to meet its demand requirements

1.4 Gas Supply Plan Execution

Include an overview of the natural gas procurement policies used by the distributors and a description of the triggers that signal that action is required. Describe the flexibility built into the plan, how that flexibility was achieved, and the impacts on customers.

1.5 Description of Continuous Improvement Strategies

Include areas of improvement in their plans.

1.6 Link to Other Applications

Distributors shall describe how their plans inform other OEB applications and how other OEB applications inform the gas supply plan. The associated bill and rate impacts shall be included in the gas supply plan. If later, the distributor submits an application that deviates from or modifies the gas supply plan, the distributor shall describe the changes and include why this impact was not originally included in the gas supply plan.

1.7 Three-Year Historical Review

Include a review of the prior three years comparing the Outlook included in the gas supply plan to actual data.

2. Annual Gas Supply Plan Update Requirements

During the annual update years, distributors shall file a letter identifying any deviations from the approved five-year gas supply plan. Based upon that filing, the OEB will determine whether further review is required. If the OEB determines that further review is warranted, distributors will submit an annual gas supply plan update to the OEB for review. The update will include a three-year analysis of actual data that the OEB can compare to the data the distributor included in the Outlook section of the gas supply plan.

The following sections describe the minimum information that distributors are to include in their update. If the OEB determines that no further review is required, the letter will service as the annual update.

2.1 Significant Changes to the Gas Supply Plan

The update shall describe the significant changes to the plan from the previously submitted Update and the resulting customer impact. If there is a significant change in the supply and demand conditions of the annual update from the five-year gas supply plan, multiple demand scenario planning as described in Appendix Section 1.2 is required.

2.2 Updated Gas Supply Plan Outlook

The update shall include updated data for the five-year Outlook.

2.3 Three-Year Historical Review

Distributors shall include a three-year historical comparison of actuals to the Outlook similar to the comparison that would be included in the gas supply plan.