

EB-2011-0242

EB-2011-0283

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B; and in particular section 36 (2) thereof;

AND IN THE MATTER OF an application by Enbridge Gas Distribution Inc. for an Order or Orders approving and setting prices for Enbridge Gas Distribution Inc.'s purchase of biomethane;

AND IN THE MATTER OF an application by Union Gas Limited for an Order or Orders approving and setting prices for Union Gas Limited's purchase of biomethane;

INTERROGATORIES OF BULLFROG POWER INC.

ISSUE 1 – Role of the Utilities

- 1 Aside from the Ipsos Reid survey conducted (Ex. B, Tab 1, App. 3):
 - (a) What examinations have Union Gas Limited (“Union”) and Enbridge Gas Distribution Inc. (“Enbridge”) performed to evaluate the impact of this initiative on the retail market, and in particular the retail market for RNG?
 - (b) In what ways and to what extent will the proposal affect the current and future retail market?
 - (c) Please provide all relevant information on the anticipated impact, including pricing, volumes, access to distribution, etc.

2 In Ex. B, Tab 1, page 11 lines 11-12, Union and Enbridge commit to supporting the development of a viable RNG market:

- (a) What impact(s) will the RNG program as proposed by Enbridge and Union have on existing RNG retailers, consumer demand for RNG and other market participants, and on Bullfrog Power in particular?
- (b) What proposals and/or strategies, if any, have Enbridge and Union prepared to establish a viable RNG market and in particular to support the development of voluntary consumer demand for RNG and to support RNG retailers?
- (c) What consideration have Union and Enbridge given to assisting the RNG market outside of Union's and Enbridge's proposed program (the "Voluntary Market") in procuring additional RNG volumes? Among other mechanisms, would Enbridge and Union consider reserving a percentage of RNG suppliers' volumes for the Voluntary Market, i.e. would Enbridge and Union consider capping their contracts with RNG suppliers at, for example, 95% of a supplier's annual volumes?
- (d) What education and awareness campaigns do Enbridge and Union propose to undertake, if any, to promote communication within the RNG industry and to educate consumers about RNG for both the Applicants' proposed plan and any plan(s) for the Voluntary Market in Ontario?

3 Would Enbridge and Union agree to terms that would make the proposed program more closely resemble a Renewable Portfolio Standard, including agreeing to a minimum of RNG that must be procured?

ISSUE 2 – Cost Consequences

4 In Ex. B, Tab 1, page 14 at lines 8-10, Union and Enbridge state that they met with a number of stakeholders on the proposed RNG Program:

- (a) Please specify which potential RNG suppliers Union and Enbridge had discussions with regarding the price that would be paid or required by the producers for biomethane.
- (b) Please provide all information concerning the discussions in (a) above including:
 - (i) when the discussions occurred;
 - (ii) who was present;
 - (iii) what specifically was discussed;
 - (iv) all details surrounding pricing for RNG, including any cost estimates or ranges provided by potential producers and/or their agents, or suggested by Union and Enbridge during discussions with potential producers and/or their agents.

5 Ex. B, Tab 1, pages 21-22: Why have Union and Enbridge chosen not to lower the prices for certain types of projects so that all suppliers receive the targeted 11% return on investment?

6 What other mechanisms did Union and Enbridge consider to establish a price for RNG that would be paid to suppliers?

- (a) Why were those other mechanisms rejected?
- (b) Would Enbridge and Union be open to holding a small request for proposals for RNG (for example, a volume of 500,000 GJ/year) in order to test the pricing that suppliers are prepared to take and provide the Board with actual data?
 - (i) If not, why not?

7 Please confirm which potential Environmental Attributes (“EAs”) will be acquired by Union and Enbridge. In particular, please confirm whether any or all of the following will be acquired as EAs by Union and Enbridge:

- (a) credits associated with destruction of methane emissions from the fuel source;
- (b) credits associated with displacement of conventional natural gas by biomethane; and/or
- (c) other credits for activities related to RNG (please specify).

8 Please provide the methodology for quantifying the amount of EAs that each project will produce and Union and Enbridge will purchase.

9 Will EAs be retired on behalf of consumers?

- (a) If yes, which EAs?
- (b) If yes, how?