



PUBLIC INTEREST ADVOCACY CENTRE  
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

March 1, 2019

VIA E-MAIL

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
Toronto, ON

Dear Ms. Walli:

**Re: EB-2018-0305 Enbridge Gas Distribution Inc. and Union Gas Limited –2019 Rates Submissions on the Draft Issues List**

---

In accordance with Procedural Order No. 1 VECC provides the following submissions with respect to the draft issues list in the above noted proceeding.

The following issues should be added to the issues list:

**1. Is the gas supply plan for natural gas commodity and transportation of natural gas appropriate?**

The gas supply plan of the Utility has a material impact on all customers. The purpose of the QRAM process is to review the implementation of the underlying gas supply plan. It follows that the gas supply plan is a “rate issue” to be considered by the Board.

**2. Does the customer engagement support the proposed Utility rate plan?**

The Board has in previous proceedings – natural gas and electricity – established that customer engagement needs to be supportive of the applicant’s proposal both in the scope of the engagement and in its result. The Applicant has filed over 400 pages of customer engagement evidence. In the absence of the matter on the issues list it is would is unclear the level of scrutiny this evidence warrants.

**3. Does the Utility System Plan for the period 2019 through 2022 support the rate plan proposal?**

The Applicant has set out 1800 pages of evidence with respect to its consolidated Utility System Plan. The Applicant states “[i]t describes how the company plans to drive operational effectiveness through strong asset management and meet the expectations set out in the Board’s Renewed Regulatory Framework (“RRF”). The draft issues does not contain any reference to this voluminous record. In the

absence of its place on the issues list parties are want to understand the scope of the matters to pursue through discovery.

In our view the implementation of a utility system plan necessarily informs future rates. The Board is unlikely (and in our view would be unwise) to render a decision on the prudence of the plan in its entirety or its cost consequence. Prudence of the plan can, by definition, only occur subsequent to the various elements of it being implemented. Nevertheless the plan forms the baseline from which variation will be considered in future proceedings. We also recognize that the current plan will be superseded by an undated plan to be filed in 2021 (see Exhibit C1, Tab 1, Schedule 1, pg.2).

In our view if the Board is not prepared to include the matter on the issues list or render any comments on the Utility System Plan than this evidence should be expunged from the record. Otherwise its inclusion necessarily provides the Board acquiescence of its implementation without any regulatory due diligence.

We otherwise support inclusion of all those items on the draft issues list.

These are our respectful submissions.

Yours truly,

M. Garner

For VECC

Email:

Kevin Culbert, Manager Regulatory Policy and Strategy , Enbridge Gas Distribution Inc.

[EGDRegulatoryProceedings@enbridge.com](mailto:EGDRegulatoryProceedings@enbridge.com)

Vanessa Innis, Manager, Regulatory Applications , Union Gas Limited

[vinnis@uniongas.com](mailto:vinnis@uniongas.com)