



150 Ferrand Drive, Suite 208  
Toronto, Ontario M3C 3E5  
T 416.926.1907 F 416.926.1601  
[www.pollutionprobe.org](http://www.pollutionprobe.org)

---

Ms. Christine Long  
Registrar and Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

May 5, 2020

**Re: EB-2020-0066 Enbridge Voluntary RNG Program  
Pollution Probe Interrogatories**

Dear Ms. Long:

Please find enclosed Pollution Probe's Interrogatories for Enbridge on the above noted proceeding.

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA  
Michael Brophy Consulting Inc.  
Consultant to Pollution Probe  
Phone: 647-330-1217  
Email: [Michael.brophy@rogers.com](mailto:Michael.brophy@rogers.com)

cc: Brandon Ott, Enbridge (via [EGRegulatoryProceedings@enbridge.com](mailto:EGRegulatoryProceedings@enbridge.com)  
and [brandon.ott@enbridge.com](mailto:brandon.ott@enbridge.com))  
David Stevens, Aird & Berlis (via email)  
Interested Parties  
Richard Carlson, Pollution Probe (via email)

**ONTARIO ENERGY BOARD**

**Enbridge Voluntary Renewable Natural Gas Program**

---

**POLLUTION PROBE INTERROGATORIES**

---

**May 5, 2020**

**Submitted by: Michael Brophy**  
**Michael Brophy Consulting Inc.**  
**Michael.brophy@rogers.com**  
**Phone: 647-330-1217**  
**28 Macnaughton Road**  
**Toronto, Ontario M4G 3H4**  
  
**Consultant for Pollution Probe**

Below are Pollution Probe's Interrogatories related to the above noted proceeding.

Pollution Probe #1

Please describe what components required for delivery of the proposed RNG program are inside the regulated utility and what components are unregulated (whether it is Enbridge or another party such as an RNG provider).

Pollution Probe #2

- a) If a consumer (e.g. City of Ottawa) wanted to use RNG locally without requiring it to be injected into the rate-regulated pipeline system, would that fall inside or outside the proposed program? Please explain.
- b) If RNG was developed and transported or used without the use of any regulated assets (i.e. a dedicated line instead of injecting into the gas distribution system), are OEB approvals required? If yes, please explain what approvals would be required.
- c) The proposed program relates to RNG that Enbridge purchases and transports. If a customer wanted Enbridge just to transport RNG that they purchase directly, please explain how that would work and what OEB approvals (if any) Enbridge would need for that purpose.

Pollution Probe #3

Please explain the difference in emissions and costs for a customer if they fund a unit (cubic meter or GJ) of RNG under the proposed program vs. purchasing a unit (cubic meter or GJ) of regular natural gas plus enough emission offset credits to make their emissions equal.

Pollution Probe #4

- a) Please explain the difference in lifetime emissions (i.e. CO<sub>2</sub>e emissions to extract, clean and put into the transmission or distribution system) for a typical unit (cubic meter or GJ) of RNG compared to that of a unit (cubic meter or GJ) of natural gas.

- b) Please provide a table showing the % RNG in the Enbridge Ontario distribution system for program year 1 through 10 (based on Enbridge's current program forecast).

Pollution Probe #5

Please describe (or provide) what documentation a customer will receive to document their emissions reduction by using RNG instead of natural gas.

Pollution Probe #6

- a) Please explain if Enbridge has coordinated with municipalities or other potential customers in Ontario to calculate the amount of interest in purchasing RNG.
- b) If analysis from part (a) was conducted, how does that compare to potential supply of RNG under the program?

Pollution Probe #7

Reference: Enbridge Guiding Principle 3 – “The Program will not require legislative changes or government funding;”

- a) Please confirm that Enbridge would apply government funding (from any level of government) if it was provided to accelerate RNG development and use.
- b) Please confirm that if government funding was provided for RNG it would be specifically used to reduce the costs to customers using RNG.

Pollution Probe #8

Reference: Enbridge Gas's research shows that \$2 per month is a 'sweet spot' for customers who are willing to pay a premium to participate in a Voluntary RNG Program

Please provide a copy of the research report referenced.

Pollution Probe #9

- a) Please confirm if the \$2 per month fixed charge is applicable to all customer classes.
- b) Companies often like to highlight their support for environmental and sustainable actions as part of their shareholder reporting and/or Sustainability Report. Would Enbridge be willing to assess an option to charge more (e.g. market-based value assessment) for those types of customers? If not, please explain.
- c) Given that there is only a monthly fixed charge to participate in the program, could a consumer (e.g. company) that is not an Enbridge customer participate in this program?
- d) Can another utility or company partner with Enbridge to offer this to its customers on a private label basis (e.g. Epcor, municipalities, etc.)?
- e) Given Enbridge's expertise and economies of scale for RNG programs, could Enbridge develop a larger scale program for large commercial and industrial customers or is this the only offering planned?

Pollution Probe #10

- a) Has Enbridge run any cost effectiveness analysis for this program (e.g. Societal Cost Test)? If yes, please provide the results.
- b) Please explain the likely sources for RNG for this program and if there will be net benefits created.

Pollution Probe #11

- a) If approved by the OEB, please confirm the frequency Enbridge will use to assess the program and make changes as part of the continuous improvement cycle.
- b) Please confirm that Enbridge will consult with relevant customers and stakeholders (e.g. municipalities with energy and emissions plans) as part of its process for program continuous improvement.

Pollution Probe Interrogatories

- c) Please indicate which stakeholder groups will be targeted during the marketing and promotion of this program.
- d) Please confirm which Ontario municipalities would be included in the target group for RNG supply RFP communications and RNG program updates.

Pollution Probe #12

- a) If the Company achieves its forecast of 22,711 GJ of RNG in the first 12 months of the Program, please show the calculation on how much savings will be achieved for customers related to the reduction in the Federal Carbon Charge.
- b) Please explain if RNG is applicable for Offset credit generation. If yes, please explain who owns the offsets if a credit is generated.

Pollution Probe #13

- a) Has Enbridge done an assessment of RNG supply potential for this program? If yes, please provide a copy.
- b) Please describe what will happen if program demand exceeds RNG supply (i.e. contract) availability.
- c) Please provide details on the two RNG production facilities currently under construction in Ontario and several more in the planning stage of development.

Pollution Probe #14

Please provide a copy of the proposed terms of program enrollment and cancellation.