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Our File # 339583-000271

By electronic filing

May 7, 2020

Christine E. Long
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. (“EGI”)
Voluntary Renewable Natural Gas Program Application
Board File #: EB-2020-0066**

Pursuant to the Board’s Procedural Order No. 1 dated April 22, 2020 , we submit the following Interrogatories for EGI on behalf of Canadian Manufacturers & Exporters (“CME”).

Yours very truly,

A handwritten signature in blue ink, appearing to read 'Scott Pollock', is written over a light blue horizontal line.

Scott Pollock

enclosure

c. Brandon Ott (EGI)
David Stevens (Aird & Berlis LLP)
Alex Greco (CME)
EB-2020-00066 Intervenors

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ONTARIO ENERGY BOARD

Enbridge Gas Inc.

IN THE MATTER OF the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Sched. B, as amended;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order or orders related to its Voluntary Renewable Natural Gas Program;

AND IN THE MATTER OF an application by Enbridge Gas Inc. for an order or orders amending or varying the rates charged to customers for the sale, distribution, transmission, and storage of gas commencing as of January 1, 2021.

**INTERROGATORIES OF
CANADIAN MANUFACTURERS & EXPORTERS (“CME”)
TO ENBRIDGE GAS INC. (“EGI”)**

CME # 1

Ref: Exhibit B, Tab 2, Schedule 1, page 7 of 9

At Exhibit B, Tab 2, Schedule 2, page 7 of 9, EGI stated that it has been engaged in unregulated activities (RNG upgrading services) and that it “will be working with these [RNG production facilities] project developers and providing the services they require to get their RNG to market.”

Accordingly, it is CME’s understanding that EGI may have an interest in ensuring that certain RNG market participants, with whom EGI has a relationship and may provide services for, continue to do business.

- (a) Please describe the process that EGI will undertake to ensure that there is no conflict of interest when selecting RNG providers, and the best value for ratepayer funding is achieved.

CME # 2

Ref: Exhibit B, Tab 2, Schedule 2, page 1 of 2

At Exhibit B, Tab 2, Schedule 2, page 1, EGI stated that “Enbridge gas may purchase RNG for a seasonal or year-long contract, subject to the availability of RNG in the market on shorter terms.” EGI also discussed “procurement intervals” through which purchases will be made.

CME wishes to better understand EGI’s proposal with respect to year long contracts and procurement intervals.

- (a) If EGI were to enter into a year-long contract, would the gas purchase pursuant to that contract be made once upfront (a specific quantity of gas at a specified price) and delivered over the course of the year, or would multiple purchases be made at procurement intervals within the framework of a year long contract, with the quantity of

gas to be purchased at each interval dependent on the prevailing price of RNG during that interval?

CME # 3

Ref: Exhibit B, Tab 2, Schedule 4, page 2 of 2

At Exhibit B, Tab 2, Schedule 4, page 2, EGI described the costs of the voluntary RNG program. EGI stated that “The Company will manage these operating costs within its existing budgets until rebasing in 2024. Managing these costs within existing O&M budgets will allow Enbridge Gas to dedicate all RNG Contributions collected during the deferred rebasing term toward the procurement of RNG, rather than the recovery of the Company’s costs.”

- (a) Please confirm whether it is EGI’s intention to recover amounts from ratepayers after rebasing in 2024.
- (b) If the answer to (a) is yes, please confirm whether the costs of the voluntary RNG program (including the revenue requirement associated with the \$600,000 capital cost in 2021) will be borne by those who do not opt-in as well as by those who do.

CME # 4

Ref: Exhibit C, Tab 1, Schedule 1, page 1 of 1

At Exhibit C, Tab 1, Schedule 1, page 1, EGI’s cost comparison chart shows that the “low case” for RNG is 5.4 cents per kilowatt hour, off-peak electricity is 10.1 cents per kilowatt hour, and the “high case” for RNG is 10.8 cents per kilowatt hour.

- (a) When determining the “high case” and “low case” for RNG, did EGI determine how likely each scenario was? If so, please provide how likely EGI believes it is that RNG will be priced as the “high case” and how likely it will be priced at the “low case”.
- (b) If RNG were not cost competitive with other renewable resources, such as off-peak electricity, would EGI change anything about the voluntary RNG program, whether in program design, scope etc.? Please explain fully.