



**PUBLIC INTEREST ADVOCACY CENTRE**  
**LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC**

**ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7**

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: [piac@piac.ca](mailto:piac@piac.ca). <http://www.piac.ca>

Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

March 21, 2012

**VIA MAIL and E-MAIL**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge St.  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: EB-2011-0242; EB-2011-0283 EGD and Union RNG Applications  
Vulnerable Energy Consumers Coalition (VECC)  
Interrogatories to Bullfrog Power**

Please find enclosed VECC's Interrogatories to Bullfrog Power in the above-noted proceeding. We have also directed a copy of the same to the Applicants.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC

Encl.

Cc Julli Abouchar, Willms and Shier LLP

bcc

Norm Ryckman, Enbridge Gas Distribution Inc. (By email)

Fred D. Cass, Aird & Berlis LLP (By email)

Karen Hockin, Union Gas Limited (By email)

Alexander Smith, Torys LLP (By email)

**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 to Bullfrog Power on behalf of  
The Vulnerable Energy Consumers Coalition (VECC)**

**VECC IR#1**

Reference: **WITNESS STATEMENT OF TOM HEINTZMAN, March 2, 2012, Para 2**

Preamble:

In addition, however, there will be consumers who wish to purchase exclusively RNG rather than the standard system mix. The proposed renewable natural gas program of Union and Enbridge (the "RNG Program") should be structured so as to encourage, and not prejudice or negatively impact, *the voluntary purchasing of renewable natural gas by consumers*.

1. Provide a summary of Bullfrog Power's (BP) Business Plan for RNG in Ontario and comment how this fits with the current application
2. In Bullfrog Power's (BP) experience, how many Canadian jurisdictions have a combination of mandatory and voluntary (customer elective) options for RNG purchase

## VECC IR #2

Reference: **WITNESS STATEMENT OF TOM HEINTZMAN, March 2, 2012, Para 6**

Preamble:

Bullfrog believes that giving consumers a renewable energy choice has at least two very positive benefits. First, voluntary demand provides necessary economic support for new renewable energy. Second, a widely available and well communicated consumer choice educates and engages consumers.

1. In BP's opinion, should customer choice be predominant, as is the case for natural gas supply in Ontario and most other jurisdictions?
2. If not, provide detailed reasons why customer choice should not be the predominant factor for RNG
3. Can BP develop an RNG market in Ontario based on RNG being an elective Green option for consumers? Please elaborate including necessary prerequisites.
4. Could BP develop an RNG market in Ontario if, as well as being a (elective) Green option for consumers, EGDI and Union purchased RNG for their Utility Own Gas use as well?

## VECC IR #3

References: **WITNESS STATEMENT OF TOM HEINTZMAN, March 2, 2012, Paras 16 and 17**

Preamble:

Generally speaking, there are two types of markets for EAs: compliance markets and voluntary markets. In compliance markets, the law imposes an obligation to procure renewable energy. These are frequently known as Renewable Portfolio Standards. The entity obliged to procure the renewable energy procures it on behalf of all consumers. While the proposed RNG Program is not mandated by the Ministry of Energy but rather is being initiated at the request of the Applicants and there is no target for the amount of RNG they must procure, *the proposed RNG Program is analogous to a compliance market or a Renewable Portfolio Standard in that Union and Enbridge seek approval from the Board to procure RNG on behalf of all the consumers they serve.* [Emphasis Added]

- 1 Explain whether/if Ontario has a Renewable Portfolio Standard
- 2 Point to the legislation enabling this RPS.
- 3 Demonstrate by providing legislative or government policy references, that the RPS applies to RNG

## **VECC IR #4**

References: **WITNESS STATEMENT OF TOM HEINTZMAN, (March 2, 2012) Para 19**

Preamble:

There are approximately 29 states, as well as the District of Columbia and Puerto Rico, which have RPS policies for renewable electricity in the US. In parallel, there are over 860 voluntary green electricity offerings in 48 states in the US, which adds to the compliance programs and increases the amount of renewable electricity in the mix. In five of the last six years, the voluntary market has been responsible for more of the renewable electricity procurement in the US than all of the compliance programs put together.

1. List the jurisdictions in Canada that have either an RPS or other voluntary green electricity policy (indicate whether RPS or Voluntary).
2. List Canadian jurisdictions that have an RPS or voluntary program for RNG. Indicate whether RPS or voluntary).
3. In any of the above jurisdictions indicate any that have regulated rates or any other support/subsidy from gas consumers.

## **VECC IR#5**

Reference: **WITNESS STATEMENT OF TOM HEINTZMAN, (March 2, 2012) para 22**

Preamble:

Bullfrog Power launched its RNG product in March 2011. The product was the first RNG product widely available to consumers in Canada. The initial source of the RNG is the first RNG project in Canada. The RNG is injected into the TransCanada pipeline system. To my knowledge, Bullfrog Power's RNG offering is the only RNG offering available to Ontario consumer.

1. Provide the current number of RNG customers and annual volumes of RNG under contract to BP (2011 actual and projected 2012).
2. Delineate as a subset the Canadian and Ontario market metrics.
3. Provide a Comparison to the customers and volumes proposed by each of EGDI and Union.
4. Provide the premium that BP customers pay for RNG. Compare this to that proposed by EGDI/Union.

## **VECC IR#6**

Reference: **WITNESS STATEMENT OF TOM HEINTZMAN, (March 2, 2012) Para. 26**

Preamble:

Bullfrog Power's objective in this hearing is twofold: first to avoid the program as currently proposed by the Applicants from harming the development of a voluntary consumer market for RNG in the province; and second to advocate for measures that would accelerate the development of a voluntary consumer market for RNG in the province.

1. Explain How BPs business model is affected by EGDI and Unions proposal for System Gas/Sales Service customers to provide a premium/subsidy for RNG supply. Include clear information of BPs potential role in terms of supplier, wholesaler and or marketer of RNG in the franchises.
2. Is BP planning to target non System Gas/Sales customers now under direct purchase arrangements? If so discuss how this will work, for example if BP will take over or add to existing contracts or provide a bundled new offering.
3. How will either a voluntary or mandatory program by EGDI and Union affect BPs business model Discuss both positive and negative attributes.

## **VECC IR#7**

Reference; **WITNESS STATEMENT OF TOM HEINTZMAN, (March 2, 2012) Para 27**

1. Please list and discuss all the reasons/attributes of the proposed EGDI/Union RNG program that "may/will threaten the development of a viable consumer market". Provide appropriate analogies to the current Ontario natural gas and electricity markets
2. Has Bullfrog discussed its proposal set prices for RNG through an RFP with EGD and Union? Please elaborate.
3. What does BP mean by "aggressive pricing"? Please elaborate with quantitative examples, not only in the context of this Application, but experience in other jurisdictions.
4. What access to transmission and distribution does BP have at present for RNG and what is BP seeking in future from EGDI and Union? Please elaborate.
5. What "Other Rules and Supporting Structures" does BP consider to be necessary? Please elaborate in the context of OEB jurisdiction and Government policy/legislation.

## **VECC IR#8**

Reference; **WITNESS STATEMENT OF TOM HEINTZMAN, (March 2, 2012)**

Please summarize in one paragraph, BPs position(s) on the current Application and in particular any changes it may propose.