

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 FOR BULLFROG POWER INC. ("BULLFROG")
FROM THE CONSUMERS COUNCIL OF CANADA**

REF: Witness Statement of Tom Heintzman, Paragraphs 7, 10

1. The evidence states that Bullfrog Power sells it renewable electricity and RNG product across the country. In addition, the evidence states that Bullfrog power is using market forces to drive renewable energy capacity (of any kind, including RNG generation). Please reconcile this with the statements made by Union and EGD that unless prices are set as proposed in the program a viable RNG industry will not develop in Ontario in the near term.

REF: Witness Statement of Tom Heintzman, Paragraph 9

2. What is the "premium above the market price for the commodity" that Bullfrog consumers pay renewable energy facilities? How is the extent of that "premium" determined?
3. How does Bullfrog determine that "These premiums are necessary to make the facilities economically viable and permit investment in more renewable generation"?
4. Does Bullfrog believe that Enbridge Gas Distribution Inc. ("EGD") and Union Gas Limited ("Union") should "invest equity to facilitate the building of new renewable generation"?

REF: Witness Statement of Tom Heintzman, Paragraph 15

5. What is meant by the statement: “Bullfrog Power also retires all of the Environmental Attributes associated with this renewable power on its customers’ behalf”? What does it mean to “retire” Environmental Attributes?

REF: Witness Statement of Tom Heintzman, Paragraph 27

6. What is meant by the statement “The pricing for the RNG should be set as aggressively as possible while still permitting the development of RNG facilities”? Does Bullfrog believe that the price set for RNG for Union and EGD should be above, below, or the same as the price which Bullfrog charges for RNG for its customers?

7. Paragraph 27 contains the statement: “the best way of ensuring appropriate pricing would be to hold a request for proposals for a small amount of RNG and allow the industry to provide their best prices”.

In their response to Board Staff Interrogatory Number 5, EGD and Union list the following “cons” for a request for a proposal. Please provide Bullfrog’s comments on each of those “cons”.

8. The Witness Statement states that “the rules of the RNG Program should give priority access to distribution and transmission to supply that is destined for the voluntary RNG market”. What is meant by that statement? What rules does Bullfrog propose? Does Bullfrog have examples of such rules, in other jurisdictions? If so, please provide those examples.
9. The Witness Statements states that “many other rules and supporting structures will be required to implement the RNG Program, and these too must favour supply for voluntary demand if a true market is to emerge”. What other rules and supporting structures does Bullfrog believe will be required?
10. Has Bullfrog discussed its proposal to select prices for RNG through a request for proposals with EGD and Union? If not, why not? If so, please describe the nature of the discussions and the positions of the LDCs.

REF: Witness Statement of Tom Heintzman, Paragraph 28

11. Paragraph 28 contains the statement: “the Applicants should be required to develop innovative strategies for encouraging the growth of voluntary demand”. Does Bullfrog power believe that the development of those “innovative strategies” should be paid for by the shareholders of EGD and Union or by their system gas customers or all customers?

12. Bullfrog proposes that the Applicants be required to “Support the communication and marketing programs of companies building the voluntary market”. What does Bullfrog propose by such support? Please provide examples of such support in Canada and New York State.
13. Bullfrog proposes “Reserving a portion of the output of projects for the voluntary market, as has been done for electricity in New York State.” How would the portion to be reserved be determined? Who would pay for the portion of the output thus reserved?
14. Please explain what Bullfrog envisions with respect to EGD and Union supporting the communication and marketing programs of companies building the voluntary market.
15. Please explain what type of model Bullfrog is suggesting with respect to billing and collection. Would this be offered on a cost recovery basis?
16. If the environmental benefits of renewable power are to be realized by all Ontario ratepayers why, from Mr. Heintzman's perspective, should system gas ratepayers exclusively be responsible for paying for the premium?

4449277.1