

May 15, 2012

Via Courier and RESS

Kirsten Walli
Board Secretary
Ontario Energy Board
PO Box 2319
2300 Yonge Street
Suite 2700
Toronto, ON
M4P 1E4

Re: Enbridge Gas Distribution Inc. and Union Gas Limited – Renewable Natural Gas Application

Board File Nos.: EB-2011-0242; EB2011-0283

Dear Ms. Walli,

Pursuant to Procedural Order No. 7 in the above noted proceedings, please find attached the Final Argument of Direct Energy Marketing Limited.

Yours faithfully

Original signed by

Ric Forster
Director
Government & Regulatory Affairs
Direct Energy Marketing Limited

Cc: Applicants
Cc: Interested Parties

DIRECT ENERGY MARKETING LIMITED

**Final Argument re: Enbridge Gas Distribution Inc. and Union Gas Limited
Application for an order approving or fixing rates for the sale of gas that includes the cost
consequences of the purchase of renewable natural gas**

Introduction

1. It is the position of Direct Energy (DE) that, on all the evidence, Enbridge Gas Distribution (Enbridge) and Union Gas Limited (Union) (collectively "the utilities") have failed to discharge their evidentiary burden that the Ontario Energy Board (the Board) should approve the cost consequences of including long-term supply contracts with Renewable Natural Gas (RNG) producers for inclusion in the utilities' supply portfolio for system gas customers.

2. This submission will set out to demonstrate that the utilities have no legislative mandate to foster an RNG market in Ontario, and that the proposed RNG program not only places unnecessary cost increases on gas customers, it is also contrary to sections of the Ontario Energy Board Act (the Act). Furthermore, the approval of such a program would dramatically alter the competitive landscape in the natural gas market in Ontario.

3. It is also the opinion of DE that the Board has already made a Decision on these types of initiatives by the utilities in EB-2009-0172, and as such has set precedence in this matter.

No Legislative Mandate

4. As evidenced by the utilities' response to VECC IR#15, (Exhibit I-15-1 a.) as well as the exchange between the witness panel and Mr. Millar in Vol. 3 of the Transcripts, it is clear that the utilities have neither a legislative mandate nor Ministerial Directive to procure RNG or to foster an RNG industry.

MR. MILLAR: ...

But starting at the highest level, I guess, the legislative level, you would agree with me that there is no specific legislation authorizing or promoting this particular program? Would that be fair?

MR. GOULDEN: That's our understanding.

MR. MILLAR: There is nothing -- we've already discussed this with Mr. Buonaguro, but there's nothing similar to the FIT program that's been specifically authorized and run by the government and the OPA?

MR. GOULDEN: No, that's correct.

MR. MILLAR: The government hasn't chosen to pursue a similar

program on the gas side?

MR. GOULDEN: No, not explicitly.

MR. MILLAR: Do you have the Board's objectives handy? You can see them on the screen, if you don't. It is section -- section 2 is gas, but I will be referring to section 1, which is electricity, as well.

MR. GOULDEN: Yes, we have those.

MR. MILLAR: By and large, though not entirely, the electricity and gas objectives mirror each other, or they do at least to some extent; would you agree with that? For example, the business about protecting interests of consumers, et cetera?

MR. GOULDEN: They appear to. We don't --

MR. MILLAR: Some of them do, anyway; obviously not all of them. If you could take a look at the Board's objective number 5 under "Electricity" it states:

"To promote the use and generation of electricity from renewable energy sources in a manner consistent with the policies of the Government of Ontario, including the timely expansion or reinforcement of transmission systems and distribution systems to accommodate the connection of renewable energy generation facilities."

Do you see that?

MR. MACLEAN: Yes.

MR. MILLAR: And can you confirm for me that there is not a similar provision on the gas side?

MR. MACLEAN: Yes.

MR. MILLAR: Are you aware -- and I imagine you would be aware, but are you aware of any government directives that specifically address this type of program, an RNG program?

[Mr. Goulden and Mr. Maclean confer]

MR. MACLEAN: We're aware of the Green Energy Act, which would generally -- generally provide a policy direction under which a program such as this might be consistent, but we're not aware of any specific direction about an RNG program, in particular.

[Transcript, Vol. 3, page 149, line 2 to page 151, line 7]

5. Furthermore as attested to by Mr. MacLean, the utilities also have no waste management responsibilities.

MR. THOMPSON: Can we agree that a gas utility does not have any waste management responsibilities?

MR. MACLEAN: I think we can agree that a gas utility doesn't have, directly, waste management responsibilities.

[Transcript, Vol. 2, page 157, lines 25 to 28]

The RNG proposal is contrary to sections of the OEB ACT

Section 2. Board objectives, gas

6. While the utilities rely on the conservation and efficiency objectives in Section 2.5. of the Act in support of their application, it appears the utilities have chosen to ignore the Board's other responsibilities within this section. The Act clearly sets out the Board's objectives for natural gas in relation to market structure and consumer protection, and states in part:

2. "The Board, in carrying out its responsibilities under this or any other Act in relation to gas, shall be guided by the following objectives:

1. To facilitate competition in the sale of gas to users.
2. To protect the interests of consumers with respect to prices and the reliability and quality of gas service."

7. With respect to the Board's first objective, the utilities' RNG proposal clearly undermines competition in both the wholesale and retail natural gas markets. On the wholesale side, the proposal displaces 5.5 PJs¹ of gas from the utilities' competitively priced supply procurement practices and designates it to RNG suppliers at a premium price for 20 years.

8. On the retail side, one of the fundamentals of competition is customer choice and product differentiation. The utilities' proposal undermines natural gas Marketer offerings by eliminating choice for default supply customers and imposing a supply product with environmental attributes at a premium price. Differentiation in terms of product offerings, price, and contract term, along with the ability for

¹ Exhibit B, Tab 1, page 18, line 11 and Exhibit C, page 1, line 15.

customers to choose such options are the cornerstone of the competitive market. Should the utilities wish to offer such products, they could remove themselves from the default supply function and obtain a Marketer's license. Instead, the utilities have proposed to use their position as a default supplier to undermine competition and eliminate customer choice with a mandatory RNG program; as an "opt in" program was deemed not viable.

MR. BUONAGURO: Right. So let me tell you what I take from that. If I combine what I was told through evidence yesterday in terms of why the question was removed -- and part of that answer was, We expected about 1 percent opt-in, which would necessitate a 40 to 50 percent premium on the customers who opted in and, therefore, we didn't do that, and then you have jumped in and said, Well, that is partly because of the direction we gave them. Fair enough. My understanding from all of that, though, is your direction to Ipsos Reid -- and I am putting words in your mouth, but you're saying, Don't bother with an opt-in program. We're never going to get opt-in which would make sense. And somehow you had that impression and gave that impression to Ipsos Reid.

MR. GOULDEN: Sorry, that is not exactly what happened.

As I understand it, originally, the contemplation of the market research was around a potentially voluntary program.

As we discussed it internally -- so between the two companies -- about is it voluntary and what does the program look like, we determined, in fact, in our view a voluntary program could not be a successful program. So consequently with regards to the market research, the market research was changed to reflect what we finalized our approach to be, which was going to be a mandatory-type program.

MR. BUONAGURO: Thank you. So the numbers that were thrown around yesterday -- 1 percent opt-in and 40 or 50 percent resulting premium -- is simply a reflection of a general direction, which is opt-in is just not going to work?

MR. GOULDEN: Yes, that's correct.

[Transcript, Vol. 3, page 127, line 4 to page 128, line 9]

9. The utilities disregard for customer choice and competition is evidenced multiple times in their testimony including the confirmation that system gas customers will have no choice but to pay the proposed RNG premiums²; and that the utilities have not completed any formal analysis on the impacts of this program on the retail market for biomethane³. In fact, the utilities confirm that the proposed RNG program undermines competition as it would compete directly against Marketers with subsidization from ratepayers.

MR. WARREN: All right. Now, Mr. Gardner has covered this question of the impact on the competitive market, and I just -- I just want to explore it a little bit in this context. In terms of the market that you're developing, can we agree that for that portion of Enbridge's and Union's customers who don't want to pay an increment for renewable natural gas, that those customers are subsidizing this proposal? Is that not fair?

MR. GOULDEN: Yes, although based on the market research, 68 percent of our residential customers propose -- or support this proposal.

MR. WARREN: Now, if Mr. Gardner or someone else wanted to get into the renewable natural gas market, they would be competing against a subsidized product being offered by the two utilities; is that not fair?

[Mr. Goulden and Mr. Maclean confer]

MR. MACLEAN: The answer is that, yes, they would be competing against our product, and they're open to acquiring alternative products from either inside or outside of Ontario.

[Transcript, Vol. 2, page 120, line 14 to page 121, line 6]

² Transcripts, Vol.2, page 81 line 25 to page 82 line 6.

³ Transcripts, Vol.2, page 83 lines 16 – 25.

10. With regards to the Board's second objective for gas in section 2 of the Act, DE believes that the utilities' RNG proposal clearly does not protect the interests of consumers with respect to prices, reliability, and the quality of gas service - in fact it does the opposite.

11. Firstly, the utilities' RNG proposal is not necessary to ensure the reliability and diversification of natural gas supplies. As evidenced in the response to Direct Energy IR #7, Exhibit I-7-7 part b., the Canadian outlook from the National Energy Board's "Canada's Energy Future – Energy Supply and demand Projections to 2035", published November 2011, indicates that natural gas reserves and demand equates to approximately 191 years of supply at the 2009 reserve level and 2011 demand level. These 191 years of supply addresses the demand of the entire country and not just the Province of Ontario. Furthermore, with the continual development of shale gas in the U.S. and Canada, it would be reasonable to assume that the level of supply will increase, having a dampening effect on price.

12. Secondly, as evidenced by Undertakings J4.6 b) and J4.8, the utilities are asking ratepayers to pay a premium in excess of \$1.3 billion⁴ over a twenty year period for gas they don't need. It is clear that the utilities recognize this fact by the exchange between the witness panel and Mr. Warren on the first day of the hearing.

MR. WARREN: ...

Panel, am I right in my understanding that renewable natural gas is not required in order to meet the existing demand for natural gas in Ontario?

MR. GOULDEN: Yes, you are correct.

MR. WARREN: Now, I don't think you need to turn it up, but in case you need a reference, it is my friend from the LPMA's Interrogatory No. 24. Am I correct in my understanding that for Enbridge alone, the additional cost, annually, for purchasing renewable natural gas is some \$36 million? Is that right, Mr. Maclean?

MR. MACLEAN: If you give me a second, I will check the reference. You said it was LPMA?

MR. WARREN: Number 24.

MR. MACLEAN: Thank you.

MR. WARREN: Answer (b) on that page:

"The annual increase in gas costs based on January 1, 2012 QRAM would be approximately \$36.2 million."

⁴ Combined EGD and Union total, calculated by multiplying the annual customer impacts provided in J4.6 b), and J4.8 by 20 years.

Have I read that correctly, Mr. Maclean?

MR. MACLEAN: Yes, you have.

MR. WARREN: So am I correct, can I conclude from the answers to those two questions, that what you are proposing is that system gas customers in Ontario pay \$36.2 million a year for gas they don't need?

MR. MACLEAN: We're suggesting that system gas customers pay that amount of money to acquire a product that gives them the benefits that will accrue to them in the long term.

MR. WARREN: Thank you for that answer, but I would appreciate if you would answer my question, which was: Am I right in understanding that you're asking system gas customers to pay \$36.2 million for gas that they don't need? Yes or no?

[Mr. Goulden and Mr. Maclean confer]

MR. MACLEAN: We're asking system gas customers to pay that amount of money to acquire the same amount of comparable renewable natural gas as natural gas. If you want to constitute it as "don't need" in terms of the total amount of volume and, therefore, what that means from a heat point of view and use of their equipment, then I would agree with you.

MR. WARREN: Well, it is a little more basic than that, Mr. Maclean. You have answered my question that there is no need for renewable natural gas. There is sufficient supply from other sources at the present time; correct? You have said "yes" to the answer, Mr. Maclean. I am not sure you need to consult with Mr. Goulden on it, but go ahead if you wish.

[Mr. Goulden and Mr. Maclean confer]

MR. MACLEAN: I think I have answered the question clearly. There is no supply need for the purposes of running your equipment.

[Transcript, Vol. 2, page 97, line 27 to page 99, line 23]

13. Not only are the utilities increasing costs to customers for RNG supply which is not required, they are inappropriately using these increased costs to enhance their brand value and protect growth and earnings⁵. Furthermore, Enbridge would benefit from the RNG program with an increase in revenue requirement of up to \$500, 000 annually as a result of an increase in carrying costs of gas in storage.⁶ It should not be the responsibility of the ratepayer to bear the costs of enhanced branding and earnings for the utilities, especially when shareholders are not bearing any costs of the development of the program (Enbridge specific),⁷ or the increased supply costs.

14. Lastly on the matter of price impacts of the RNG proposal on customers, the utilities have proposed to increase supply costs for customers to purchase an RNG product that is the direct result of the waste removal and processing which has already been paid for through their customer's municipal taxes. Furthermore, given that during the hearing the utilities continually pointed to the potential for a carbon tax/credit regime in the future, should such a regime come to pass, the RNG program would then subject natural gas customers to an additional form of tax by creating a third layer of costs on top of the municipal tax for waste removal and the potential carbon tax.

MR. FORSTER: Okay, thank you. So system gas customers, would you think that they would pay for waste disposal through their municipal taxes?

MR. GOULDEN: I think I do. I don't know.

MR. FORSTER: I know I do.

MR. MACLEAN: I'm pretty sure my wife does.

[Laughter]

MR. FORSTER: Then is it fair to say, then, that there is a potential, if this application is approved, that we could pay for carbon, if you will, or we could be paying for an RNG program, we could be paying a carbon tax, and we could also be paying for our municipal waste processing?

[Mr. Goulden and Mr. Maclean confer]

MR. MACLEAN: Sure. That's possible.

[Transcript, Vol. 3, page 145, line 22 to page 146, line 7]

⁵ Exhibit I-5-4, Attachment 4, page 2.

⁶ Exhibit IE-7-11, part b.

⁷ Transcript, Vol. 2, page 112, lines 18 to 26

15. To offset the costs of the RNG program the utilities claim they will monetize the environmental attributes (EAs) associated with the program, and return those funds back to the system supply customers that have paid for the program. However it is unclear as to how this might occur given that the utilities have agreed that no true carbon market currently exists in the Province⁸; could not place a current value on carbon⁹; and could not determine how EA's would be captured in a deferral account for future monetization¹⁰.

16. While the utilities may have pointed to a legislative framework that exists for carbon cap and trade, they have been unable to produce specific legislation or regulations that demonstrate that a future carbon tax/credit regime will equally credit back customers on a dollar for dollar basis for the increased costs of the RNG program. All we know for certain is that there are increased costs for customers as a result of this program, with only speculation over if, when, and to what degree any environmental attributes might be monetized and returned to the customers. As such, any notion of future credits to customers cannot be contemplated at this time.

17. It would also seem logical that if the biomethane the utilities are planning to procure is produced from landfill sites, that the associated EAs should already belong to the consumers that paid their municipal taxes for their waste to be processed. It would appear then, that this program is trying to re-sell EA's back to the very people who have already paid for them, and again should not be relied upon as a source of RNG supply cost offsets.

Section 29 of the Act

18. Section 29 of the Act reads as follows:

29. (1) On an application or in a proceeding, the Board shall make a determination to refrain, in whole or part, from exercising any power or performing any duty under this Act if it finds as a question of fact that a licensee, person, product, class of products, service or class of services is or will be subject to competition sufficient to protect the public interest.

Scope

(2) Subsection (1) applies to the exercise of any power or the performance of any duty of the Board in relation to,

- (a) any matter before the Board;
- (b) any licensee;
- (c) any person who is subject to this Act;
- (d) any person selling, transmitting, distributing or storing gas; or
- (e) any product or class of products supplied or service or class of services rendered within the province by a licensee or a person who is subject to this Act.

19. It is Direct Energy's opinion that sufficient competition exists in the current market with respect to the sale of natural gas in order for the Board to refrain from exercising its powers in this matter. It would appear that the utilities also agree that a robust competitive market for the sale of natural gas exists.

MR. THOMPSON: Anyway, in the gas, the market for procuring gas

⁸ Transcripts, Vol. 3, page 144, lines 7-10

⁹ Transcripts, Vol. 3, page 144, lines 20-22

¹⁰ Transcripts, Vol. 2, page 92, line 14 to page 94, line 14; Transcripts, Vol. 5, page 95, line 11 to page 96, line 15

has been, I suggest, pretty competitive for many, many years.

MR. SMALL: I would have to agree with you. I think certainly we've seen, over the last few years, that Dawn has become a widely traded hub for gas supplies.

There's also the anticipation with the amount of gas that's going to become available through Marcellus, the shale supplies, and it seems like every year there seems to be new possibilities coming up.

[Transcript, Vol. 5, page 84, line 24 to page 85, line 5]

And;

MR. THOMPSON: The point I wanted to make was this, is that the market is as competitive as it is today because gas buyers were able to avoid long-term contracts at fixed prices that were in excess of what the gas sellers were prepared to sell to producers. And your proposal is a giant step backwards. You want this Board to impose long-term contracts at fixed prices above market prices on a certain -- for a certain segment of your purchases, you want that to be imposed on ratepayers. I suggest it is entirely incompatible with the way competitive pricing has evolved in gas. Do you agree?

[Witness panel confers]

MS. EVERS: Certainly purchasing natural gas in the natural gas market has evolved into a very competitive environment, but what we're asking the Board is to approve a program that has other benefits that we are -- we have promoted through the last four days.

[Transcript, Vol. 5, page 85, line 17 to page 86, line 6]

The Board has already set precedence in this matter

20. It is clear by the questions asked in the Ipsos-Reid customer surveys, as well as the testimony provided by the witness panel that the utilities are looking to invest in the maturation of an RNG supply market by investing customer funds in long term RNG supply contracts.

MR. WARREN: ...Actually, just for the sake of certainty, perhaps I could ask you to go back to that CME No. 9 and to the Ipsos-Reid survey, which appears on page 24.

Now, on page 24, under category (g), number 6, it reads:

"Do you strongly support, somewhat support, somewhat oppose or strongly oppose your natural gas utility..."

And I underscore the following words:

"...investing in biogas projects?"

If you are not paying any money, gentlemen, in what sense are the utilities investing in biogas products? You don't have any skin in the game, do you, folks?

MR. MACLEAN: I think the context of that question is that money would be spent investing in these projects, and I think it is reasonable to assume that the customer would make the connection that the utility is spending that money.

MR. WARREN: They would make that assumption, but that assumption would be wrong, wouldn't it, because you are not spending any money on these programs, are you? You're asking the ratepayers to spend the money.

I put it to you bluntly, Mr. Maclean, I am going to suggest to you that using the words "investing in biogas projects" is, in this case and against these facts, a misleading impression created for the responders to the survey?

MR. MACLEAN: I wouldn't agree with that. As a consumer, if my utility says that they're going to be spending money on something, I am expecting I am going to pay for it, anyways, as a

consumer, because in fact all money that flows through the utility comes from consumers, ultimately.

[Transcript, Vol. 2, page 113, line 25 to page 115, line 1]

21. In EB-2009-0172, Enbridge applied to have "Green Energy Initiative" assets included in the regulated utility to be a component of total rate base for ratemaking purposes¹¹. The total cost of all of these initiatives for 2010 was approximately \$10 million, of which \$4.0 million was forecast to be closed to rate base. This would have resulted in an associated 2010 revenue requirement of approximately \$300,000 – a substantially lower annual cost to customers than what is being contemplated in this application.

22. The Board heard as a preliminary matter whether or not it had the jurisdiction to approve the cost consequences of Enbridge's proposed Green Energy Initiatives. One of the Green Energy Initiatives that Enbridge planned to pursue in 2010 was the capture and use of biogas from landfills or anaerobic digesters. The project would have included Enbridge's involvement with facilities and the associated pipelines required to convert raw biogas from either a landfill operation or from an anaerobic digester to bio-methane¹².

23. In keeping with Mr. MacLean's views in the transcripts noted above, regardless of whether the utilities are directly investing in facilities and recovering those costs from rate base, or whether they are investing in supply contracts and passing those costs on to consumers through their default procurement practices, the net effect of consumers paying for these utility investments in an RNG industry is the same. It is the equivalent of allowing generation/production assets to be recovered from rate base.

24. Beginning on page 5 of the Board's Decision on a Preliminary Motion in EB-2009-0172, dated December 22, 2009 the Board concluded that the cost consequences of Enbridge's Green Initiatives should not be recovered from Enbridge customers. The salient points that led the Board to this Decision are noted below:

"The Board has determined that even if it does have the jurisdiction to include the costs associated with these programs in rate base, a finding that we explicitly do not make, we will not allow these costs to be included in rate base for the reasons set out below.

There are a number of reasons why these investments should not be allowed in rate base. When assets are allowed in rate base it is generally because those assets are related to the monopoly franchise. Enbridge does not have a monopoly franchise for the production of renewable energy. Its franchise is related to the distribution of natural gas. To the extent that the Green Energy Initiatives involve activities for the production of renewable energy, they occur within a competitive market. Other participants would be materially disadvantaged were that to occur. The same line of reasoning applies to the Green Energy Initiatives that do not directly involve the generation of electricity, but which take place within a broad competitive market involving the provision of a variety of new and refined products designed to facilitate the creation of an innovative conservation culture in Ontario. Permitting a well financed public utility to include its costs of participation in this market into its rate base, thereby transferring risk to the ratepayer, is unfair to other market participants.

¹¹ EB-2009-0172, originally filed Exhibit B, Tab 2, Schedule 4, (subsequently withdrawn)

¹² EB-2009-0172, EGDI Additional Argument in Chief on Jurisdictional Issue, filed November 13, 2009.

...The third argument against allowing these costs in rate base is that an alternative funding mechanism has been established by the government. Section 25.35 of the *Electricity Act, 1998* introduced in May along with the *Green Energy Act*, provided that the Minister may direct the Ontario Power Authority ("OPA") to "develop a feed-in tariff program that is designed to procure energy from renewable energy sources under such circumstances and conditions and in consideration of such factors and within such periods as the Energy Minister may require."... In other words, the government has established a funding scheme for renewable energy sources. That funding mechanism is open to Enbridge. Moreover, this form of funding recognizes the fact that renewable energy will benefit all the citizens of the province and not just those within Enbridge's territory. If renewable energy costs are in rates, then the costs of projects will be paid by Enbridge's gas ratepayers. But those projects will benefit the people of Ontario regardless of where they are located.

... There is a fourth reason for not allowing utilities to include renewable generation assets in rate base. The Board believes that it is desirable to treat the electricity and gas sectors in a similar fashion. The same issue has arisen in relation to electricity utilities. To date, generation assets have not been allowed in rate base because under the statutory scheme that applies to electricity a regulation is required and the government has not passed any such regulation.

...For these reasons, the Board concludes that costs associated with renewable energy projects should not be included in rate base. To do so would be a significant departure from the accepted regulatory model. Assets in rate base are typically monopoly assets. These are not monopoly assets. These activities can and will be carried out by a number of entities and are essentially competitive in nature. More importantly, placing the assets in rate base not only impacts directly the gas rates but dramatically shifts the risk from shareholder to ratepayer.

... Moreover, a well-developed program to fund renewable energy exists under the recently enacted feed-in tariff program. There is, in the Board's view, no reason to introduce an additional funding mechanism that would give preference to regulated utilities."

25. Direct Energy believes that the same arguments that led the Board to determine in EB-2009-0172 that the cost consequences of Enbridge's Green Energy Initiatives should not be recovered through rate base, also apply to the RNG proposal put forth by the utilities. The utilities are proposing to recover the costs of investing in the Ontario RNG market from customers – the only difference between the RNG program and Enbridge's Green Energy Initiatives is that it proposes to recover costs within system supply costs, as opposed to rate base. As noted earlier in this submission and in the testimony before the Board, the risk of this program lies solely with the utilities' customers, and not with their shareholders. The utilities are the default service provider to natural gas customers, and as such should be securing reliable supplies at market prices; not forcing a premium supply product on system gas customers and investing on behalf of ratepayers in order to create a RNG industry in Ontario. These items do not fit within the monopoly function of the distributors.

26. The utilities also appear to be creating their own FIT program by basing many of the aspects of the RNG program on the current OPA FIT program. However, as noted in the Decision above, the Board has already indicated that the government has an established funding scheme for renewable energy sources, and that such funding mechanisms are available to the utilities.

27. And finally, the Board has recognized that a competitive market for supply already exists, and to allow well financed public utilities to recover the costs of their participation in this market from their customers is unfair to other market participants, and undermines competition. It is for these reasons that DE believes that the Board has already made a ruling in this matter, and that the RNG Program applications should be denied.

Conclusion

In closing, DE would like to thank the Board for the opportunity to present its views on this important issue and for the reasons noted in this submission, respectfully request that the Board deny Enbridge and Union's application seeking approval of including the cost consequences of Renewable Natural Gas in their supply portfolios.

All which is respectfully submitted.