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January 10, 2018

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Our File Nos. 176642/176655/177169

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attention: Kirsten Walli,
Board Secretary

Dear Ms. Walli:

Re: EB-2017-0224/0255/0275: Enbridge Gas Distribution Inc., Union Gas Limited, EPCOR Natural Gas Limited Partnership, Applications for Approval of the Cost Consequences of 2018 Cap and Trade Compliance Plans

Pursuant to Procedural Order No. 1 dated December 28, 2017, please find enclosed herewith BOMA's Interrogatories on Issue 1.10.1 in the Draft Issues List for Enbridge and Union.

BOMA has no comments on the Draft Issues List.

BOMA is also supportive of the request of Environmental Defence and the Green Energy Coalition to file expert evidence by Chris Neme as described in Mr. Elson's letter of today's date.

Yours sincerely,

FOGLER, RUBINOFF LLP

Thomas Brett
TB/dd
Encls.

cc: All Parties (*via email*)

EB-2017-0224
EB-2017-0255
EB-2017-0275

ONTARIO ENERGY BOARD

Enbridge Gas Distribution Inc.
Union Gas Limited
EPCOR Natural Gas Limited Partnership

**Applications for approval of the cost consequences
of 2018 cap and trade compliance plans**

INTERROGATORIES OF
BUILDING OWNERS AND MANAGERS ASSOCIATION, GREATER TORONTO
("BOMA")

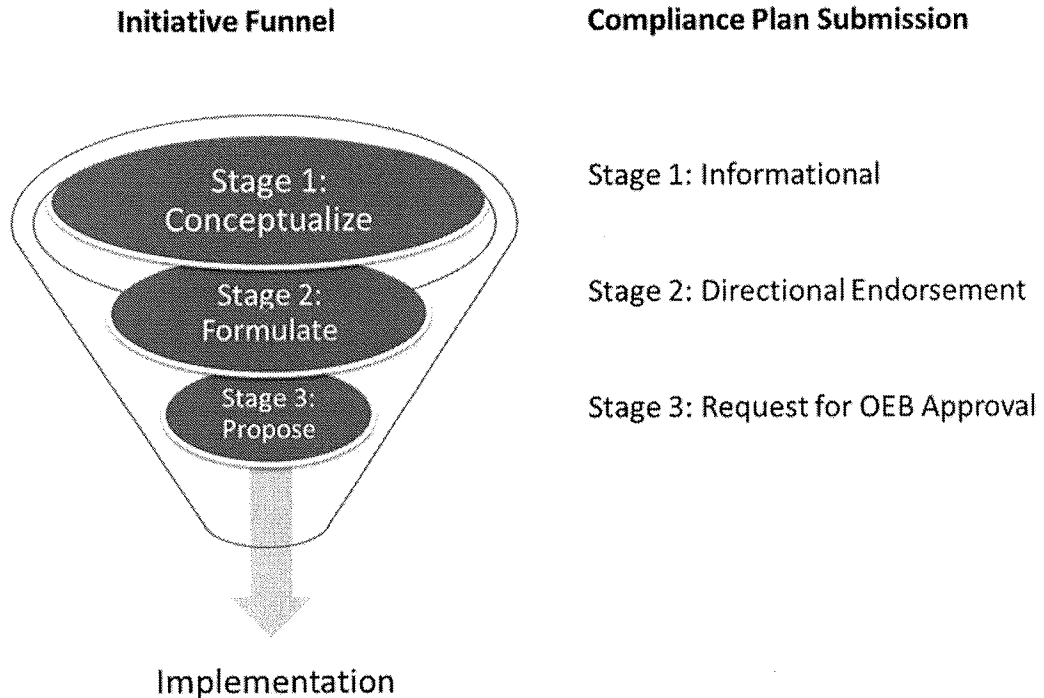
January 10, 2018

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Counsel for BOMA

Interrogatories of BOMA to Union Gas Limited

1. Ref: EB-2017-0255, Exhibit 3, Tab 4, Page 9 of 60



With respect to this initiative funnel, at what stage does Union do a business case analysis? What are the criteria used to evaluate the initiatives? Will initiatives be ranked? How did RNG become the first initiative to be proposed? Will there be exit strategies developed if the initiative doesn't achieve its results?

2. Ref: EB-2017-0255, Exhibit 3, Tab 4, Page 17 of 60

The government of Ontario and the OEB have clearly and consistently articulated support for the 10 pursuit of renewable natural gas as a component of utility gas supply portfolios. Ontario's CCAP commits funding to RNG, and the 2017 Long-Term Energy Plan, released October 26, 2017, acknowledges RNG as an "innovative Ontario-made source of energy" that can leverage the existing natural gas distribution system. 7.

Currently these products are being used directly in the generation of electricity either through the Fit Program or in cogeneration. What are the typical comparative project economics between direct use and introduction of RNG into the natural gas distribution system? Will the significant subsidization in the near-term result in stranded assets with respect to generation?

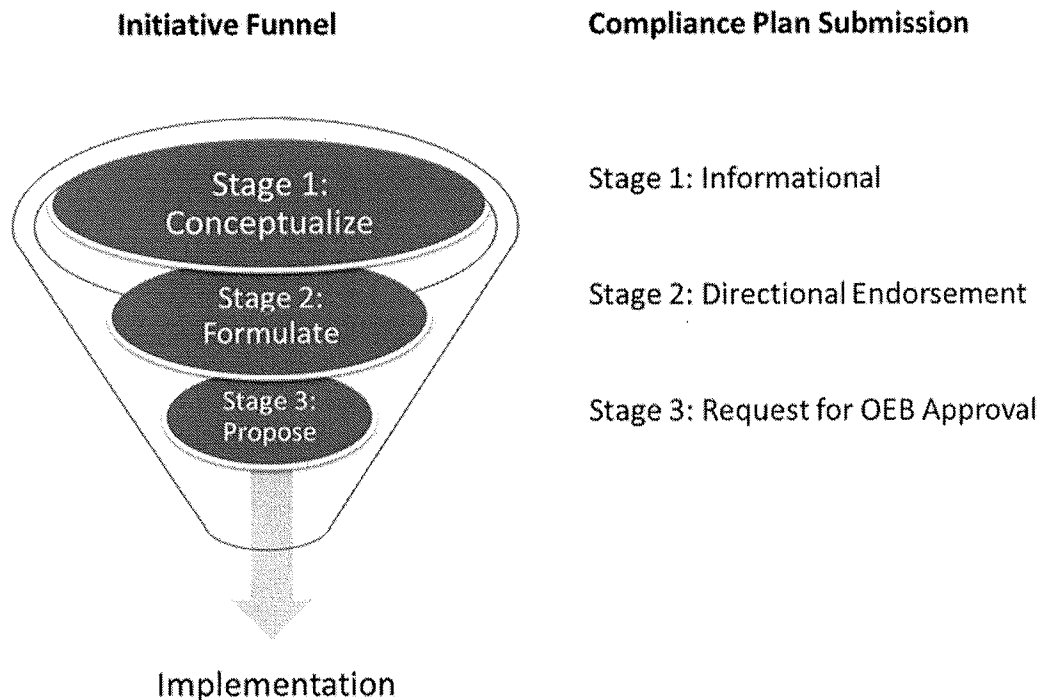
3. Ref: EB-2017-0255, Exhibit 3, Tab 4, Page 23 of 60

Expeditious (emphasis added) investment in RNG is vital to ensure Ontario's competitiveness, particularly since other jurisdictions may compete with Ontario for these same abatement opportunities. Finally, the development of RNG as an energy source helps to ensure that the significant energy infrastructure that exists for natural gas in Ontario remains used and useful for the long-term.

In September 2009, an Order in Council added initiatives such as RNG to the undertakings of the natural gas utilities. What is the reason for the almost ten year delay in moving forward on these initiatives?

Interrogatories of BOMA to Enbridge Gas Distribution Inc.

1. Ref: EB-2017-0224, Exhibit C Tab 5 Schedule 1 Page 3 of 15



With respect to this initiative funnel, at what stage does Enbridge do a business case analysis? What are the criteria used to evaluate the initiatives? Will initiatives be ranked? How did RNG become the first initiative to be proposed? Will there be exit strategies developed if the initiative doesn't achieve its results?

2. Ref: EB-2017-0224, Exhibit C Tab 5, Schedule 2, Page 3 of 29

RNG is a potential Ontario natural gas supply source that offers environmental, economic and waste management benefits. RNG (also

known as biomethane) is ungraded gas produced from organic waste, such as that found on farms, at waste water treatment plants, food processing facilities and in landfills. RNG has been identified as a significant GHG abatement opportunity in the Fuels Technical Report1 prepared by Navigant Consulting Inc. on behalf of the Ontario Ministry of Energy and Climate Change (the "MOECC"), the Board's Marginal Abatement Cost Curve ("MACC"), and now the province's Long Term Energy Plan: Delivering Fairness and Choice (the "LTEP")2.

Currently these products are being used directly in the generation of electricity either through the Fit Program or in cogeneration. What are the typical comparative project economics between direct use and introduction of RNG into the natural gas distribution system? Will the significant subsidization in the near-term result in stranded assets with respect to generation?

3. *Ref: EB-2017-0224, Exhibit C, Tab 5. Schedule 2, Page 6 of 29*

Many jurisdictions are ahead of Ontario in moving to RNG, and several models exist for delivering it to customers. European markets are actively developing renewable pipeline fuels through both RNG and Power-to-Gas ("P2G") developments. In North America, California, British Columbia and Québec have all moved forward with the early development and procurement of RNG to complement the renewable energy options that have traditionally been focused on the electricity grid.

In September 2009, an Order in Council added initiatives such as RNG to the undertakings of the natural gas utilities. What is the reason for the almost ten year delay in moving forward on these initiatives.