



**BY EMAIL and RESS**

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Ontario Energy Board  
2300 Yonge Street  
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Toronto, Ontario  
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January 12, 2018  
Our File: EB20170224

**Attn: Kirsten Walli, Board Secretary**

Dear Ms. Walli:

**Re: EB-2017-0224/255/275 – Cap & Trade 2018 Compliance Plans – RNG IRs**

We are counsel to the School Energy Coalition ("SEC"). Pursuant to Procedural Order No. 1, please find SEC's interrogatories to both Enbridge and Union with respect to Issue 1.10.1 of the Draft Issues List.

Yours very truly,  
**Shepherd Rubenstein P.C.**

*Original signed by*

Mark Rubenstein

cc: Wayne McNally, SEC (by email)  
Applicants and interested parties (by email)

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an Application by Enbridge Gas Distribution Inc. for an order or orders approving and/or accepting its 2018 Cap and Trade Compliance Plan and approving or fixing rates and/or charges to recover the costs incurred undertaking its Cap and Trade Compliance Plan;

**AND IN THE MATTER OF** an Application by Union Gas Limited for an order or orders approving and/or accepting its 2018 Cap and Trade Compliance Plan and approving or fixing rates and/or charges to recover the costs incurred undertaking its Cap and Trade Compliance Plan;

**AND IN THE MATTER OF** an Application by EPCOR Natural Gas Limited Partnership for an order or orders approving and/or accepting its 2018 Cap and Trade Compliance Plan and approving or fixing rates and/or charges to recover the costs incurred undertaking its Cap and Trade Compliance Plan.

**INTERROGATORIES**

**ON BEHALF OF THE**

**SCHOOL ENERGY COALITION**

**(ISSUE 1.10.1 OF DRAFT ISSUES LIST)**

**Enbridge**

**SEC-EGD-1**

[C-5-1, p.13] Please provide a copy of the draft MACC Report provided to Enbridge and a copy of any comments Enbridge provided to ICF and the Technical Advisory Group regarding the draft MACC Report.

**SEC-EGD-2**

[C-5-2, p.4] Please provide a copy of the internal business case that was developed for the RNG proposal.

**SEC-EGD-3**

[C-5-2, p.4] Please explain and justify any differences between the Enbridge RNG procurement proposal and the Union RNG procurement proposal.

**SEC-EGD-4**

[C-5-2, p.7-8] Enbridge has identified, in its view, limitations with the Board's MACC Report with respect to its evaluation of RNG:

- a. Please provide a comprehensive analysis on the limitations of the MACC Report discussed in the evidence identified regarding RNG.
- b. Has Enbridge conducted its own analysis on the cost effectiveness of RNG that corrects for these limitations? If so, please provide details including a detailed explanation of the calculation.

**SEC-EGD-5**

[C-5-2, p.9] Please detail the minimum requirements to be included in an agreement with the Province for Enbridge if it is to go ahead with its RNG procurement.

**SEC-EGD-6**

[C-5-2, p.9] Please provide all communications that Enbridge has had with the Province regarding RNG procurement.

**SEC-EGD-7**

[C-5-2, p.9] Please detail any unique features that Enbridge expects to include in its procurement contracts with RNG producers.

**Union Gas****SEC-UG-1**

[3-4, p.17] Please provide a copy of the internal business case that was developed for the RNG proposal.

**SEC-UG-2**

[3-4, p.19] Please provide all communications that Union has had with the Province regarding RNG procurement.

**SEC-UG-3**

[3-4, p.19] Please explain and justify any differences between the Union RNG procurement proposal and the Enbridge RNG procurement proposal.

**SEC-UG-4**

[3-4, p.19] Please detail the minimum requirements to be included in an agreement with the Province for Union if it is to go ahead with its RNG procurement.

**SEC-UG-5**

[3-4, p.19] Please detail any unique features that Union expects to include in its procurement contracts with RNG producers.

**SEC-UG-6**

[3-4, p.20-22] Please provide a list of terms that Enbridge will require in any agreement with the Government for it to go ahead with its RNG procurement?

Respectfully submitted on behalf of the School Energy Coalition this January 12, 2018.

*Original signed by*

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Mark Rubenstein  
Counsel for the School Energy  
Coalition