



Lisa (Elisabeth) DeMarco
Senior Partner
5 Hazelton Avenue, Suite 200
Toronto, ON M5R 2E1
TEL +1.647.991.1190
FAX +1.888.734.9459
lisa@demarcoallan.com

April 3, 2018

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: EB-2017-0319
Submissions on draft issues list for Enbridge Gas Distribution Inc.'s (Enbridge's)
application for approval of the cost consequences of the proposed Renewable
Natural Gas Enabling Program and Geothermal Energy Service Program**

We are counsel to Anwaatin Inc. (**Anwaatin**) in the above-mentioned proceeding (the **Proceeding**). Anwaatin makes the following submissions on the draft issues list dated March 27, 2018 (the **Draft Issues List**) pursuant to Procedural Order No. 1.

Anwaatin proposes the clarifications and additions to the Draft Issues List outlined in the following blackline, all of which are supported by Exhibit B, Tab 1, Schedule 1 (and appendices) of the evidence filed by Enbridge on January 17, 2018.

1. New Business Activities:

[...]

1.3. Are there financial impacts resulting from the proposed new business activities on Indigenous communities in the utility's service territory?

1.4. Do the proposed new business activities contribute to Ontario's Climate Change Action Plan and access to affordable energy for Ontario's Indigenous communities?

1.5 What are the greenhouse gas impacts of each of the proposed new business activities, and what assumptions support those calculations?

2. **Cost Consequences:**

2.1. ~~Is the methodology to set service fees~~ Are the proposed costs, rate/fee methodology, and fees for the RNG Enabling Program – Upgrading Service reasonable and appropriate?

2.2. ~~Is the methodology to set service fees~~ Are the proposed costs, rate/fee methodology, and fees for the RNG Enabling Program – Injection Service reasonable and appropriate?

2.3 ~~Are the services fees~~ Are the proposed costs, rate/fee methodology, and fees for the Geothermal Energy Service Program reasonable and appropriate?

2.4. What are the projected total bill impacts (geothermal loops plus electricity costs of running the heat pump) for potential consumers over the next 10 years?

3. **Deferral and Variance Accounts:**

[...]

3.2. Is the proposed disposition methodology reasonable and appropriate?

4. **Indigenous Consultation:**

4.1 Who will undertake what consultation to ensure Indigenous rights and interests in the biogas lands and injection sites have been considered and addressed?

4.2 Who will undertake what consultation to ensure Indigenous rights and interests in the geothermal lands and injection sites have been considered and addressed?

Anwaatin submits that the above clarifications and additions to the Draft Issues List support Indigenous consultation and engagement consistent with the Minister of Energy's Directive to the Ontario Energy Board (the **Board**) dated October 25, 2017 regarding the Board's implementation of the Ontario Long-Term Energy Plan. Anwaatin further submits that the above clarifications and additions will assist the Board in ensuring that the public interest and the interests of the most vulnerable Indigenous ratepayers are protected in accordance with subsection 1(1) of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sched. B. Anwaatin therefore respectfully requests that, in finalizing the issues list for the Proceeding, the Board accept Anwaatin's proposed clarifications and additions.

Yours very truly,



Lisa (Elisabeth) DeMarco