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**VIA Email, RESS and Courier**

April 10, 2018

BY EMAIL

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

Dear Ms Walli:

**Re: EB-2017-0319, Enbridge Gas Distribution Inc. (Enbridge, or the Company)  
Response to submissions of other parties on draft issues list**

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In accordance with Procedural Order No. 1, these are Enbridge's responses to the submissions from other parties on the draft issues list for this proceeding.

As set out in Enbridge's April 3, 2018 letter, the Company supports the draft issues list proposed by the OEB and attached as Schedule B to Procedural Order No. 1. The Company believes that the items set out in the draft issues list will permit relevant matters to be addressed during the course of the proceeding. However, Enbridge would not object to the addition of new issues in a couple of areas, as described below.

**A. Items raised by intervenors that do not require additional issues**

One theme in intervenor submissions is that additional issues should be added to ask about whether the OEB has jurisdiction to approve the new programs and whether they are appropriate to include within the regulated utility (see, for example, the submissions from APPRO, CBA, IGUA and SEC). In Enbridge's view, the OEB's proposed issues #1.1 and 1.2 are already framed broadly enough to permit parties to explore these questions during the proceeding. There is no need to add additional issues.

SEC notes that if the OEB approves the proposed new Geothermal Energy Service and RNG Enabling services, then there may be changes or additions to Enbridge's terms

and conditions of service, and there should be an issue as to the appropriate terms and conditions. Enbridge does not agree that this is a required issue for this proceeding. The OEB does not approve Enbridge's Conditions of Service for distribution customers, and the same would hold true for the specific terms and conditions that may apply to these new services.

A couple of intervenor submissions advocate for new issues related to Enbridge's procurement of RNG. Both E2 Energy and FRPO raise questions about costs associated with RNG procurement (with the implication that ratepayers should be protected). Enbridge's proposals in this proceeding do not include the procurement of RNG. The RNG Enabling Program deals with the approval of service fees for RNG injection and upgrading services. Enbridge's proposal for RNG procurement is being advanced in its 2018 Compliance Plan filing (EB-2017-0224). In Procedural Order No. 2 in that proceeding, the OEB determined that "the RNG Procurement and Funding model does not require approval". Questions related to RNG procurement, to the extent they remain relevant following the OEB's determination, are appropriately addressed in EB-2017-0224.

It is not clear to Enbridge that the proposed additional issues from Anwaatin are required. The first items suggested by Anwaatin relate to impacts on Indigenous communities from the proposed new activities. In Enbridge's view, relevant questions on this topic can be included within the examination of whether the new business activities should be part of the utility's regulated business. Anwaatin also suggests a new issue around the total bill impacts to customers for the geothermal energy program over ten years, including electricity costs. Given that Enbridge does not play any role in electricity billing, this does not appear to be an appropriate issue for this case. Finally, it is not clear to Enbridge that Anwaatin's suggested additional issues regarding Indigenous Consultation are necessary in this case, where the context is that any new facilities constructed outside of existing pipeline corridors would be located on residential properties owned by geothermal customers or on lands owned by RNG producers.

#### B. Additional issues suggested by intervenors that could be added

The Canadian Biogas Association suggests that there should be an issue about whether the proposed RNG injection service (Rate 401) will be mandatory, or whether a third party can provide the service. Enbridge's view is that the service will be mandatory for parties seeking RNG injection into the Company's system. However, Enbridge would not object to adding this item to the Board's issues list.

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Anwaatin asks that an issue be added in relation to the greenhouse gas (GHG) impacts of each of the proposed new business activities. While there is no direct GHG impact from the RNG enabling program (the impacts arise from the actual production and use of RNG), there are GHG savings associated with geothermal energy. In Enbridge's view, the examination of GHG impacts is likely best addressed in the context of Cap and Trade Compliance Plan proceedings. However, if the OEB believes otherwise, then Enbridge would not object to adding this item to the Board's issues list.

Yours truly,

[original signed]

Joel Denomy  
Technical Manager

cc. All parties in EB-2017-0319