Lorraine Chiassontel416-495-5499Regulatory Coordinatorfax416-495-6072Regulatory AffairsEGDRegulatoryProceedings@enbridge.com

Enbridge Gas Distribution 500 Consumers Road North York, Ontario M2J 1P8 Canada

April 17, 2018

VIA RESS, EMAIL and COURIER

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

Dear Ms Walli:

Re: Enbridge Gas Distribution Inc. ("Enbridge")
Cap and Trade Application ("Application")
Ontario Energy Board ("Board") File Number EB-2017-0224
Undertaking Responses

Attached please find Enbridge Gas Distribution's undertaking responses taken during the Technical Conference on April 10, 2018.

Undertaking JT2.6 will be filed April 18, 2018.

These responses were filed through the Board's Regulatory Electronic Submission System and will be available on the Enbridge website at www.enbridgegas.com/ratescase.

Please contact the undersigned if you have any questions.

Yours truly,

[original signed]

Lorraine Chiasson Regulatory Coordinator

cc: Mr. D. O'Leary, Aird & Berlis LLP
Mr. D. Stevens, Aird & Berlis LLP
All Interested Parties EB-2017-0224 (via email)

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.1 Page 1 of 1 Plus Attachment

UNDERTAKING JT2.1

<u>UNDERTAKING</u>

TR 2, p.5

To add a row to the table attached to ED24 estimating the value of the avoided natural gas costs.

RESPONSE

Please see the attached excel worksheet.

In preparing this undertaking response, the Company corrected an error made in the original response to Environmental Defence Interrogatory #24 filed at I.1.EGDI.ED.24, whereby the carbon price for years 2029 to 2033 had incorrectly included inflation. The table attached now includes the carbon price for years 2029 to 2033 in Real dollars.

						Value of Life	time ¹ GHG Emiss	sions Reductions	Value of Lifetime ¹ GHG Emissions Reductions from 2018 DSM Residential Program	Residential Progra	am						
	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	Total
Forecast Annual Gas Savings m3 ²	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	16,756,884	268,110,144
Forecast Annual GHG Reductions (t C02e) ³	31,419	31,419	31,419	31,419	31,419	31,419	31,419	31,419	31,419	31,419	31,419	31,419	31,419	31,419	31,419	31,419	502,707
Forecast Carbon Price (\$/t C02e) ^{4,5}	\$17.00	\$18.00	\$18.00	\$19.00	\$20.00	\$21.00	\$31.00	\$36.00	\$43.00	\$50.00	\$57.00	\$60.88	\$65.02	\$69.44	\$74.16	\$79.20	n/a
Value of GHG Reduction	\$534,126	\$565,545	\$565,545	\$596,964	\$628,383	\$659,802	\$973,994	\$1,131,090	\$1,351,024	\$1,570,958	\$1,790,892	\$1,912,673	\$2,042,734	\$2,181,640	\$2,329,992	\$2,488,431	\$21,323,792
Cost of Gas (\$/m3) ^{6,7}	\$0.1766	\$0.2112	\$0.1993	\$0.2038	\$0.2085	\$0.2133	\$0.2182	\$0.2232	\$0.2283	\$0.2335	\$0.2388	\$0.2443	\$0.2499	\$0.2556	\$0.2614	\$0.2674	n/a
Avoided Cost of Gas	\$2,958,938	\$3,538,779	\$3,339,368	\$3,415,781	\$3,493,944	\$3,573,894	\$3,655,675	\$3,739,326	\$3,824,892	\$3,912,416	\$4,001,943	\$4,093,518	\$4,187,189	\$4,283,003	\$4,381,010	\$4,481,259	\$60,880,935

Forecast Annual Gas 59,891,949 59,891,949 59,891,949 59,891,949 59,891,949 59,891,949 59,891,949 59,891,949 59,891,949 50													
59,891,949 59,891,949 59,891,949 112,297 112,297	1 2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	Total
112,297 112,297 112,297	91,949 59,891,949	59,891,949	59,891,949	59,891,949	59,891,949	59,891,949	59,891,949	59,891,949	59,891,949	59,891,949	59,891,949	59,891,949	958,271,184
Corosat Carbon Drive	12,297	112,297	112,297	112,297	112,297	112,297	112,297	112,297	112,297	112,297	112,297	112,297	1,796,758
(\$/t coze) ⁴⁵ \$17.00 \$18.00 \$18.00 \$19.00	\$19.00	.00 \$21.00	\$31.00	\$36.00	\$43.00	\$50.00	\$57.00	\$60.88	\$65.02	\$69.44	\$74.16	\$79.20	n/a
Value of GHG Reduction \$1,909,056 \$2,021,353 \$2,021,353 \$2,133,651	133,651 \$2,245,948	348 \$2,358,245	\$3,481,220	\$4,042,707	\$4,828,788	\$5,614,870	\$6,400,952	\$6,836,217	\$7,301,080	\$7,797,553	\$8,327,787	\$8,894,076	\$76,214,855
Cost of Gas (\$/m3) ^{6,7} \$0.1766 \$0.2112 \$0.1993 \$0.2038	0.2038 \$0.2085	\$0.2133	\$0.2182	\$0.2232	\$0.2283	\$0.2335	\$0.2388	\$0.2443	\$0.2499	\$0.2556	\$0.2614	\$0.2674	n/a
Avoided Cost of Gas \$ 10,575,746 \$ 12,648,197 \$ 11,935,467 \$ 12,208,582 \$ 12,487,948	08,582 \$ 12,487,9	48 \$ 12,773,706	\$ 13,066,002	\$ 13,364,988	\$ 13,364,988 \$ 13,670,815 \$ 13,983,640	\$ 13,983,640	\$ 14,303,623 \$ 14,630,929 \$ 14,965,724 \$ 15,308,180 \$ 15,558,473 \$ 16,016,781 \$	\$ 14,630,929	\$ 14,965,724	\$ 15,308,180	\$ 15,658,473	\$ 16,016,781	217,598,801

						value or	LITELITIE GROEN	nissions Reduction	Value of Lifetime GHG Emissions Reductions from 2018 Total DSM Program	tal DSIM Program							
	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	Total
Forecast Annual Gas Savings m3 ²	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	76,648,833	1,226,381,328
Forecast Annual GHG Reductions (t C02e) ³	143,717	143,717	143,717	143,717	143,717	143,717	143,717	143,717	143,717	143,717	143,717	143,717	143,717	143,717	143,717	143,717	2,299,465
Forecast Carbon Price (\$/t C02e) ^{4,5}	\$17.00	\$18.00	\$18.00	\$19.00	\$20.00	\$21.00	\$31.00	\$36.00	\$43.00	\$50.00	\$57.00	\$60.88	\$65.02	\$69.44	\$74.16	\$79.20	n/a
Value of GHG Reduction	\$2,443,182	\$2,586,898	\$2,586,898	\$2,730,615	\$2,874,331	\$3,018,048	\$4,455,213	\$5,173,796	\$6,179,812	\$7,185,828	\$8,191,844	\$8,748,889	\$9,343,814	\$9,979,193	\$10,657,778	\$11,382,507	\$97,538,648
Cost of Gas (\$/m3) ^{6,7}	\$0.1766	\$0.2112	\$0.1993	\$0.2038	\$0.2085	\$0.2133	\$0.2182	\$0.2232	\$0.2283	\$0.2335	\$0.2388	\$0.2443	\$0.2499	\$0.2556	\$0.2614	\$0.2674	n/a
Total Program Costs ⁸ \$ 56,267,166	\$ 56,267,166	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	\$56,528,979
Avoided Cost of Gas	\$13,534,684	\$16,186,976	\$16,186,976 \$15,274,834	\$15,624,364	\$15,981,891	\$16,347,600	\$16,721,677	\$17,104,314	\$17,495,707	\$17,896,056	\$18,305,566	\$18,724,447	\$19,152,913	\$19,591,183	\$20,039,483	\$20,498,040	\$278,479,736

1. For simplicty assumes a 15 year measure, although some components may have a longer measure life.

2. Forecast residential gas savings (including Low Income Part 3) as filed in the Multi-Year DSM Plan (EB-2015-0049) excalated by 2% productivity factor.

3. Assumes a conversion rate of 1.8514g of CO26 per cubic meter of gas.

4. Assumes the Mid-Bange LTCP 2029-2033 Carbon Price (Real 2017 CAD) per the "Long Term Carbon Price Forecast Report" (ICF, 2017).

5. Assumes Mid-Range LTCP 2029-2033 Carbon Price (Real 2017 CAD) esclated using the Minimum LTCPF methodology per the "Long Term Carbon Price Forecast Report" (ICF, 2017).

5. The unit costs of gas relies on vanidated 2017 DAD Measures.

7. For simplicity the cost of gas is a reasonable average based on a combination of 2018 Measures.

8. Administration costs attributed to programs that claim gas savings have been included.

					Value of	of Lifetime GF	IG EMISSIONS Ke	ductions from C	Lifetime GHG Emissions Reductions from Capped 2018 DSM Commercial and Industrial Program	M Commercial	and Industrial Pr	ogram .					
	2018	2019	2020	2021	2022	2023	2024	2025	5026	2027	2028	2029	2030	2031	2032	2033	Total
Forecast			_														
Annual Gas	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	10,780,551	172,488,816
Savings m3 ³																	
Forecast																	
Annual GHG	20.214	20.214	20214	20 214	20.214	20.214	20.214	20214	11000	20.214	1000	20.214	20 214	11000	20.214	20.214	711 505
Reductions (t	1202		17,02		111/01	117(07	50,211	17707	111/01	11100	17,07	11,01	1777	117,02	117(01	117(01	11,010
C02e).																	
Forecast																	
Carbon Price	\$17.00	\$18.00	\$18.00	\$19.00	\$20.00	\$21.00	\$31.00	\$36.00	\$43.00	\$50.00	\$57.00	\$59.85	\$62.84	\$62.98	\$69.28	\$72.75	n/a
(\$/t C02e) ^{3,0}																	
Value of GHG								-									
Reduction	\$343,630	\$363,844	\$363,844	\$384,057	\$404,271	\$424,484	\$626,620	\$727,687	\$869,182	\$1,010,677	\$1,152,171	\$1,209,780	\$1,270,269	\$1,333,782	\$1,400,472	\$1,470,495	\$13,355,264
Cost of Gas	332103	60 2112	¢0 1003	00000	7081	60 21 23	¢0 2483	60,133	2000	¢0 222F	\$0.7388	\$0.2443	007	22200	\$0.3614	25000	4/ 1
(\$/m3) ^{7,8}	\$0.17.0¢	\$0.2112	\$0.1993	\$0.2U\$	\$0.2083	\$0.2133	\$0.2162	\$0.2232	\$0.2263	\$0.2333	\$0.2300	\$0.2443	\$0.2499	\$0.2336	\$0.2014	\$0.2074	II/ d
Avoided Cost	\$ 1,002,634	373 375 5	¢ 21/020/	\$ 1003 63 4 5 5 6 7 6 5 7 1 4 8 3 8 4 6 5 1 6 5 3 1 7 6 3 1	\$ 2 247 921	2 2 200 267	¢ 2 251 990	\$ 2405,609	200057 ¢ 3254 000 ¢ 3.466 000 ¢ 3.467 747 ¢ 3.547 465 ¢ 3.623 ¢ 3.667 ¢ 3.663 030 ¢ 3.466 000 ¢ 3.467 705	2 2 517 055	¢ 2574652	¢ 2 623 E67	¢ 2,602,020	¢ 2755 472	¢ 2010 E2E	\$ 2 882 021	\$ 20 167 795
of Gas	+co,coc,t ¢	5 2,210,010	, 2,140,304	C+C'1CT'7 6	100',47',7 ¢	, 2,233,201	, 2,331,000	4 2,403,036	,4,000,14,	, 2, J11, UJJ	200,410,2	4 2,033,307	, 2,033,830	21+1001,4 ¢	, 2,010,323	4,663,021	C01,101,050 ¢

1. For simplicty assumes a 15 year measure life for all measures, although some components may have a longer measure life.
2. capped participants represent approx. 18% of Commercial and Industrial customers per EB-2017 B-2-1, Table 1, p. 6 and DSM volumes are proportional to total volumes.
3. Forecast commercial and industrial gas savings (including Low Income Part 3) as filed in the Multi-Year DSM Plan (EB-2015-0049) escalated by 2% productivity factor.
4. Assumes as conversion rate of 1.875kg of CO2e per cubic meter of gas.
5. Assumes the Mid-Range LTOP 2018 - 2028 Carbon Price (Real 2017 CAD) per the "Long Term Carbon Price Forecast Report" (ICF, 2017).
6. Assumes Mid-Range LTOP 2023 Sarbon Price (Real 2017 CAD) per the "Long Term Carbon Price Forecast Report" (ICF, 2017).
7. The unit cost of gas relies on unaudited 2017 inputs converted to real dollars using the inflation value from the LTOP.
7. For simplicity the cost of gas is a reasonable average based on a combination of DSM measures.

	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	Total
Forecast Annual Gas Savings m3 ³	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	49,111,398	785,782,368
Forecast Annual GHG Reductions (t C02e) ⁴	92,084	92,084	92,084	92,084	92,084	92,084	92,084	92,084	92,084	92,084	92,084	92,084	92,084	92,084	92,084	92,084	1,473,342
Forecast Carbon Price (\$/t C02e) ^{5,6}	\$17.00	\$18.00	\$18.00	\$19.00	\$20.00	\$21.00	\$31.00	\$36.00	\$43.00	\$50.00	\$57.00	\$59.85	\$62.84	\$62.98	\$69.28	\$72.75	n/a
Value of GHG Reduction	\$1,565,426	\$1,657,510	\$1,657,510	\$1,749,594	\$1,841,677	\$1,933,761	\$2,854,600	\$3,315,019	93,959,606	\$4,604,194	\$5,248,781	\$5,511,220	\$5,786,781	\$6,076,120	\$6,379,926	\$6,698,922	\$60,840,645
Cost of Gas (\$/m3) ^{7,8}	\$0.1766	\$0.2112	\$0.1993	\$0.2038	\$0.2085	\$0.2133	\$0.2182	\$0.2232	\$0.2283	\$0.2335	\$0.2388	\$0.2443	\$0.2499	\$0.2556	\$0.2614	\$0.2674	n/a
Avoided Cost of Gas	\$	8,672,112 \$ 10,371,522 \$ 9,787,083 \$ 10,011,037 \$ 10,240,117 \$ 10,474,439	\$ 9,787,083	\$ 10,011,037	\$ 10,240,117	\$ 10,474,439	\$ 10,714,122	\$ 10,959,290	\$ 11,210,068 \$	\$ 11,466,585		\$ 11,728,971 \$ 11,997,362	\$ 12,271,894	\$ 12,271,894 \$ 12,552,708 \$ 12,839,948 \$ 13,133,760	\$ 12,839,948	\$ 13,133,760	\$ 178,431,016
1. For simplicty assumes a 15 year measure life for all measures, although some components may have a longer measure l	umes a 15 year mo	easure life for all m	easures, although	n some componer.	its may have a lon	iger measure life.											

For simplicty assumes a 15 year measure life for all measures, although some components may have a longer measure life.
 Uncapped participants represent approx. 82% of Commercial and Industrial customers per EB-2017 B-2-1, Table 1, p.6 and DSIM volumes are proportional to total volumes.

2. Forecast commercial and industrial gas savings (including Low Income Part 3) as filed in the Multi-Year DSM Plan (EB-2015-

Sumes a conversion rate of 1.875kg of CO2e per cubic meter of gas. sumes the Mirt.Banse ITCBE 2018 - 2028 Carthon Drice (Real 2017 CAD) nor the "Inner Term Carbon Brice Enreract Benort" ICE - 2017)

Assumes wild-hange LICPF 2025-2033 Carbon Price (real 2017 CAU) escated using the winnimum LICPF methodology p
 The unit cost of gas relies on unaudited 2017 inputs converted to real dollars using the inflation value from the LTCPF.

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.2 Page 1 of 1

UNDERTAKING JT2.2

UNDERTAKING

TR 2, p.5

To add a row to the table attached to ED24 showing the program administrator costs, incentive costs, programs costs, administration costs.

RESPONSE

Please see attachment to Undertaking JT2.1filed at Exhibit JT2.1.

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.3 Page 1 of 1

UNDERTAKING JT2.3

<u>UNDERTAKING</u>

TR 2, p.7

To split the chart in ED24 up between capped and uncapped customers and to provide it in excel format

RESPONSE

Please see attachment to Undertaking JT2.1 filed at Exhibit JT2.1.

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.4 Page 1 of 2

UNDERTAKING JT2.4

<u>UNDERTAKING</u>

TR 2, p.10

To update on a best-efforts basis the net benefits according to the program administrator cost test and the TRC for 2018 DSM programs, to add the long-term carbon price forecast

RESPONSE

Enbridge does not update forecasts for TRC on an annual basis.

In order to be responsive to this undertaking, Enbridge has referenced "Table 3: 2018 TRC-Plus and PAC Analysis and Ratios" from EB-2015-0049¹ and tables utilized in the response to Environmental Defence Interrogatory #24 found at Exhibit I.1.EGDI.ED.24 for the EB-2017-0224 proceeding.

Because the TRC Plus test included a component to account for benefits such as environmental, economic and social, two scenarios are presented below, one where the LTCPF is added to the TRC Plus test and a second scenario where the LTCPF is added to the TRC test but the "Plus" (i.e., the 15% adder) is removed. Enbridge does not have insight into what portion of the 15% adder the Board intended to account for carbon, and so is using these two scenarios for illustrative purposes.

TRC Plus Net	TRC Plus + GHG	TRC (no plus) + GHG
Benefits	Related Benefits*	Related Benefits*
\$165,962,507	\$222,960,321	\$193,799,630

	PACT + GHG Related Benefits*
\$196,098,168	\$262,040,550

*GHG Avoided costs were derived through a conversion of the \$/tCO₂e values provided in Exhibit I.1.EGDI.ED.24.

¹ EB-2015-0049, Exhibit B, Tab 2, Schedule 3, page 5 of 8.

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.4 Page 2 of 2

Caveats

- 1. The forecast for this TRC calculation was developed in 2015 for the 2018 time period. Actual program spend, actual program results and the current cost of gas have all changed significantly, which will result in a material change (likely a decrease) in this forecast.
- 2. Converting the cost per tonne of carbon to a cost per m³ does not account for facility-related Cap and Trade costs.
- 3. Many of these values can be significantly impacted by a future NTG assessment.

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.5 Page 1 of 1

UNDERTAKING JT2.5

<u>UNDERTAKING</u>

TR 2, p.19

For Attachment 1 of STAFF IR 24, to redo the analysis comparing the 2018 potential according to the potential study versus the DSM plan for all three scenarios

RESPONSE

The incremental analysis requested is presented below. Please note it is presented differently as the analysis in Board Staff Interrogatory #14 filed at I.1.EGDI.STAFF.24 was a sum of 2018-2020, while the request was for 2018 only.

	Enbridge		OEB CPS Scenarios	.
	2018 DSM Filed Plan ²	Constrained	Semi-constrained	Unconstrained
Aggregate Annual Savings Ontario 2015 - 2020 (million m³/yr)		1,187	1,338	1,869
Average Annual savings - Ontario 2015 - 2020 (million m³/yr)		198	223	312
Annual Program Spending Ontario (\$ million)		111	149	550
Enbridge % of Total ¹		56	56	56
Enbridge Annual Gross Savings (million m³/yr)		112	126	176
Net to Gross (NTG) Adjustment Factor ¹		0.73	0.73	0.73
Enbridge - Annual Net Savings (million m³/yr)	74	81	92	128
Enbridge Annual Program Spending (\$million/yr)	74		32	120
	68	63	84	310

^{1 -} Calculated average from Exhibit C, Tab 5, Schedule 2

^{2 –} The values for the 2018 DSM filed plan, exclude the programs that were not approved. These were forecasted values at the time of the plan. The actual targets for 2018 will be set according to the Target Adjustment Mechanism and the actual results can vary significantly.

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.7 Page 1 of 1

UNDERTAKING JT2.7

<u>UNDERTAKING</u>

TR 2, p.44

To advise whether the proposals to government and presentations to government predated the commitment of 100 million.

RESPONSE

The Climate Change Action Plan ("CCAP") was released on June 8, 2016 and included \$100 million for RNG.

The specific proposal around a long term competitive procurement of RNG with the long term carbon abatement price of RNG being borne by ratepayers and the premium from CCAP funds was made in August of 2017, well after the CCAP's release.

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.8 Page 1 of 2

UNDERTAKING JT2.8

<u>UNDERTAKING</u>

TR 2, p.49

To make best efforts to provide the number of participants by measure in the C&I and prescriptive customers

RESPONSE

Enbridge has several points of context to provide before setting out the requested information.

First, as noted in the discussion at the Technical Conference (2Tr49, lines 1 to 12), Enbridge agreed to make best efforts to provide customer numbers by measure for C&I prescriptive programs, rather than C&I and prescriptive programs.

Second, as noted by Enbridge at the Technical Conference, the 2016 numbers are not finalized (the audit program is ongoing) and it is important to recognize that changes can still occur.

Third, it must be recognized that without the inclusion of a more comprehensive picture of the marketplace in which results are being achieved and of the remaining results from the rest of the C&I program, only a partial picture is being presented. A more accurate and complete review of the Company's results in 2016 will be best seen at the conclusion of the audit. In addition, moving forward, addressing the marketplace context in which results are achieved will be important.

Taking all of that context into account, the Company's current information about participants by measure for the C&I prescriptive programs in 2016 is listed below.

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.8 Page 2 of 2

Technology	Participant
Air Doors	29
Boiler - Condensing	10
Boiler - Hydronic	2
Boiler - Hydronic Condensing	8
Boiler - Hydronic Condensing - Replacement	5
Boiler - Hydronic High Efficiency Boiler - Hydronic High Efficiency -	25
Replacement	5
Condensing Make Up Air Unit	1
Condensing Unit Heater	1
DCV	20
Destratification	19
Direct Contact Water Heater	2
Dishwasher	26
ERV	8
Fryer	33
Furnace	9
HRV	3
Infrared	202
Kitchen Ventilation	59
Make Up Air Unit	1
Ozone Laundry	24
Tank Type Water Heater	1
Water Heater - Tankless/Instantaneous	1

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.9 Page 1 of 1

UNDERTAKING JT2.9

<u>UNDERTAKING</u>

TR 2, p.64

For the utility-scale project, to advise whether Enbridge anticipates that to be funded by the IESO or through the LCIF.

RESPONSE

To clarify, the LCIF is identified as the source of funding to advance the utility's capability to include hydrogen as a constituent in the gas supply. The existing power to gas project is proposed as a potential source of hydrogen for blending in the natural gas system; but, the need for the utility to manage safety, integrity and system operability with hydrogen in the gas supply mix is a result of many evolving gas supply technologies that include next-generation RNG, methanation, power to gas, etc.

Ontario's Ministry of Environment and Climate Change has identified hydrogen as a source of renewable content for natural gas systems. The existing power to gas project provides the utility with the first operating gas supply opportunity that involves hydrogen, and as such it has been identified as the likely candidate-facility to support the early hydrogen blending developments; however, the engineering and due diligence to confirm this site as the first utility-scale blending project must occur first, and this will be funded by the LCIF.

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.10 Page 1 of 1

UNDERTAKING JT2.10

<u>UNDERTAKING</u>

TR 2, p.85

To provide an example of how actuals vs variances will flow through the PGVA and GHG DVA.

RESPONSE

Please refer to the response to Undertaking JT2.6 filed at Exhibit JT2.6.

Filed: 2018-04-17 EB-2017-0224 Exhibit JT2.11 Page 1 of 1

UNDERTAKING JT2.11

<u>UNDERTAKING</u>

TR 2, p.89

To provide an example or understanding of how bad debt expense is calculating resulting from increased bills due to cap and trade costs

RESPONSE

Enbridge's total revenue requirement has increased as a result of Ontario's Cap and Trade program (the "Program"), which began in 2017. Since Enbridge was in the middle of the Company's Custom Incentive Regulation model, Company revenues were not adjusted or updated to account for the launch of this Program. Generally, the Company notes that an increase in revenue requirement results in an increase in bad debt. In other words, bad debt is proportional to revenue requirement.

The following illustrative example has been provided. Assuming Enbridge's revenue requirement and bad debt forecasts have been set at \$100M and \$1M, respectively. If Enbridge's actual revenue requirement is \$110M or 10% higher than forecast due to Cap and Trade, the Company expects that its bad debt expense would increase by a commensurate 10% or \$0.1M.

It should be noted that Enbridge has only provided a forecast of Cap and Trade related bad debt in this proceeding. The Company will only seek to recover the incremental amount based on actual bad debt expense.

As detailed in Exhibit D, Tab 1, Schedule 1, pages 8 and 9, the above methodology will be used to determine the amount of bad debt associated with Cap and Trade.

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UNDERTAKING JT2.12

<u>UNDERTAKING</u>

TR 2, p.92

To advise the number of FTEs approved for 2017 and then how many were actually filled.

RESPONSE

In EB-2016-0300, Exhibit C, Tab 3, Schedule 6, Enbridge forecasted that the Company would require seven full time equivalents ("FTEs") for 2017. Five FTEs were filled.

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UNDERTAKING JT2.13

<u>UNDERTAKING</u>

TR 2, p.148

When the bids are in, to provide a range; taken under advisement.

RESPONSE

The RNG supply procurement process is currently ongoing; the Company anticipates bids back later this month from prospective RNG suppliers. The Company has indicated in the RFP materials that any contracts would be awarded on or by May 1, 2018, but that this is contingent on the Government of Ontario providing funding to help offset the higher cost of RNG as compared to conventional natural gas.

Enbridge is not prepared to provide information about the range of RFP bids, even after the bids are received. It is not clear to Enbridge that this information is relevant. The range of bids received will presumably be at a much larger range that any final contract amounts and if no RNG contract is ever signed (because, for example certain conditions precedent cannot be met), then the RFP bid information will not be relevant.

What is relevant are the costs that the Company and ratepayers will ultimately pay for RNG supply. The Company will provide information about any RNG contracts that are completed, once they are finalized. That information will be relevant to Enbridge's future gas costs. Once the contracts are awarded, the Company will work with the successful RFP proponents to finalize contracts. Contract finalization is anticipated by the end of the year, and will likely be completed after a decision has been rendered on the 2018 Compliance Plan. Enbridge will provide information about pricing of any RNG contracts that are completed, after they are finalized, in future Compliance Plan filings.

In addition to concerns about relevance, Enbridge also wishes to highlight that the requested information is commercially sensitive. Disclosure of pricing information from RFP responses could lead participants to be reluctant to participate in future Enbridge RFP processes, and it could also provide valuable information to future bidders about how to structure their next bids.

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UNDERTAKING JT2.14

<u>UNDERTAKING</u>

TR 2, p.151

To recategorize the non-salary items into the categories of what are overheads and what's compensation, and specifically does Enbridge have an incentive program as part of the compensation.

RESPONSE

Enbridge provides the following forecast breakdown between i) total salary, ii) benefits and pension, iii) short-term incentive plan, iv) total compensation and v) total overhead. Please note that these allocations have been approximated and are based on the most current information available.

Total Salary	\$1,027,397
Benefits	\$ 318,493
Incentive Plan	\$ 154,110
Total Compensation	\$1,500,000
Total Overhead	\$ 0

An employee's short-term incentive plan is based upon Company objectives as well as personal objectives specific to the employee's area of the business. Personal objectives are reviewed throughout the year and are subject to change based on business requirements. Some of the Carbon Strategy group's high level objectives include:

- On-time submission of provincial and federal greenhouse gas ("GHG") reports;
- Implementation of current Compliance Plan;
- Submission of annual cap and trade reporting metrics to the Ontario Energy Board ("OEB"); and
- Completion and filing of the 2019/2020 Compliance Plan to OEB.

No personal objectives were set specific to achievement of certain allowance or offset procurement pricing.