

ANWAATIN INTERROGATORY #1

INTERROGATORY

Issue 4

Reference: • Exhibit B / Tab 1 / Schedule 1 / pp. 7-8, #21 and 22
• Issues 4.1 and 4.2

Preamble: Enbridge Gas Distribution Inc. (**Enbridge**) states that it is working with the Ontario Geothermal Association (**OGA**), the Ministry of Environment and Climate Change (**MOECC**), and the Ministry of Energy (**MOE**) to find solutions to overcome barriers to the adoption of ground source heat pump heating and cooling systems ("**geothermal systems**"), such as high initial costs and inconsistent deployment and installation practices.

- a) Please describe in general terms Enbridge's existing and planned consultation and engagement with Indigenous rights-holding communities in Ontario with respect to the proposed Geothermal Energy Service Program (**GES Program**).
- b) Please describe specifically Enbridge's existing and planned consultation and engagement with Indigenous rights-holding communities in Ontario on solutions to overcome barriers to the adoption of geothermal systems that may be unique to Indigenous communities, including high initial costs and inconsistent deployment and installation practices.
- c) Please describe any Ontario government (e.g., MOECC, MOE, Ontario Energy Board) Crown consultations with Indigenous rights-holding communities in Ontario with respect to Crown decisions for the GES Program.

RESPONSE

- a) The Company has not yet consulted indigenous rights-holding communities in Ontario with respect to the proposed Geothermal Energy Service Program. Enbridge's proposals have been designed generically to be suitable all potential customers of the proposed services. Once the Board has rendered a decision in this proceeding Enbridge will assess the degree of interest the various First Nations communities may have in partaking in the Geothermal Energy Service Program and how best to work with these communities to deliver these programs to them.

- b) Please see the Company's response to part a) above.
- c) The Company is not aware of any consultations that may or may not have taken place between Ontario government (e.g., MOECC, MOE, Ontario Energy Board) ministries or agencies and indigenous rights-holding communities in Ontario with respect to the Enbridge proposed Geothermal Energy Service Program.

ANWAATIN INTERROGATORY #4

INTERROGATORY

Issue 4

Reference: • Exhibit B / Tab 1 / Schedule 1 / p. 6, #15 and pp. 23-24, #66-67
• Issues 4.1 and 4.2

Preamble: Ontario's Climate Change Action Plan promises future funding to promote the adoption of, among other things, air source heat pumps in the residential building sector.¹ The 2017 Long-Term Energy Plan indicates that "natural gas will continue to play a role in space and water heating, but we must use it as efficiently as possible and supplement it with the next generation of clean energy technologies, such as ground-source and air-source heat pumps."²

- a) Please explain whether Enbridge intends to expand its GES Program to include natural gas air source heat pumps to First Nation reserve homes and other Buildings.
- i) If yes, please explain the timing, resources, and costs and how such an expansion will be tied to an overall plan to expand natural gas services to First Nation reserve communities throughout Enbridge's current and future (Union Gas) service areas to ensure that the GES Program is intentionally inclusive of First Nation reserve households as potential beneficiaries.

RESPONSE

- a) Please see response to Board Staff Interrogatory #11 b) filed at Exhibit I.2.EGDI.STAFF.11.
- i) Please see response to a) above.

¹ Ontario Climate Change Action Plan at 67.

² 2017 Long-Term Energy Plan at 109 and 115.

ANWAATIN INTERROGATORY #5

INTERROGATORY

Issue 4

Reference: • Exhibit B / Tab 1 / Schedule 1 / p. 24, #69 and p. 26, #76-77
• Issues 4.1 and 4.2

Preamble: Enbridge indicates that it plans to offer the GES Program to the residential market. For customers that participate in the GES Program, Enbridge will supply and install separate geothermal loops for each home or building owner. Enbridge also states that the home or building owner will arrange for the installation of the ground source heat pump and other equipment necessary to complete the geothermal energy system. Enbridge will provide support to the customer to ensure that the appropriate equipment is procured and installed.

- a) Please explain what Enbridge means by the "residential market" with respect to First Nation reserve communities in Ontario.
- b) Please explain what Enbridge means by the home owner "will arrange for the installation of the ground source heat pump and other equipment necessary to complete the geothermal system" with respect to First Nation reserve households, where the home is not "owned" by the occupants. For example, who would be responsible for: (1) procuring a geothermal energy system from a supplier, and (2) contracting for the installation of that system?
 - i) What arrangements will Enbridge make to use bona fide First Nation contractors for installing the geothermal loops and installing the ground source heat pump systems? Please explain.
 - ii) Please explain in detail how Enbridge intends to provide support to First Nation customers to ensure that the appropriate equipment is procured, installed, and properly maintained for the life of the equipment.
 - iii) Please explain in detail how both ground source heat pump system maintenance costs and geothermal loop system maintenance costs will be covered, by whom, and what payment approaches will be available to cover these costs.

RESPONSE

- a) Please see the Company's responses to Board Staff Interrogatory #12 filed at Exhibit I.2.EGDI.STAFF.12 and OGVG Interrogatory #1 filed at Exhibit I.1.EGDI.OGVG.1.
- b) In stating that the home owner "will arrange for the installation of the ground source heat pump and other equipment necessary to complete the geothermal system", Enbridge means the home owner will arrange for the installation of the ground source heat pump and other equipment necessary to complete the geothermal system. In the event that the dwelling is a tenanted property typically the owner of the property would be responsible for the cost of the heating and cooling equipment in the building. In such cases Enbridge would provide its Geothermal Energy Service to the building owner who would also be responsible for the cost of owning and maintaining the ground source heat pump and other equipment necessary to complete the geothermal system.
 - i. Please see the Company's response to Anwaatin Interrogatory #2, part b) filed at Exhibit I.1.EGDI.Anwaatin.2.
 - ii. Please see the Company's response to Anwaatin Interrogatory #2, part b) filed at Exhibit I.1.EGDI.Anwaatin.2.
 - iii. Similar to the gas distribution paradigm, Enbridge will be responsible for maintaining the piping that delivers energy to the building, the ground source loops. The cost of this service will be recovered from the customer as part of their monthly geothermal energy service fee paid to the Company. The customer will be responsible for the cost of maintaining their heat pump and other equipment necessary to complete the geothermal system (air handling unit, ductwork, thermostat, electricity supply etc.).

ANWAATIN INTERROGATORY #7

INTERROGATORY

Issue 4

Reference: • Exhibit B / Tab 1 / Schedule 1 / p. 4, #11-12
• Issues 4.1, and 4.2

Preamble: The RNG Enabling Program is intended to allow Enbridge to provide upgrading and injection services for RNG producers, in an effort to increase the supply and availability of low-carbon renewable natural gas in Ontario.

- a) Please describe in general terms Enbridge's existing and planned consultation and engagement with Indigenous rights-holding communities in Ontario with respect to the proposed RNG Enabling Program.
- b) Please describe specifically Enbridge's existing and planned consultation and engagement with Indigenous rights-holding communities in Ontario on solutions to overcome barriers Indigenous community and/or Indigenous business participation in renewable natural gas upgrading and injection services, including, for First Nations, both on-reserve services and services located on First Nation traditional territories.
- c) Please describe any Ontario government (e.g., MOECC, MOE, Ontario Energy Board) Crown consultations with Indigenous rights-holding communities in Ontario with respect to Crown decisions for the proposed RNG Enabling Program.

RESPONSE

- a) The Company has not yet consulted indigenous rights-holding communities in Ontario with respect to the proposed RNG Enabling program. Enbridge's proposals have been designed generically to be suitable all potential customers of the proposed services. Once the Board has rendered a decision in this proceeding Enbridge will assess the degree of interest the various First Nations communities may have in partaking in its RNG Enabling programs and how best to work with these communities to deliver these programs to them.
- b) Please see the Company's response to part a) above.

- c) The Company is not aware of any consultations that may or may not have taken place between Ontario government (e.g., MOECC, MOE, Ontario Energy Board) ministries or agencies and indigenous rights-holding communities in Ontario with respect to the Enbridge proposed RNG Enabling program.