

Direct Dial: 416.642.4871  
File: 7321

By Electronic Mail & RESS Filing

August 28, 2018

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Ontario Sustainable Energy Association  
Written Reply Submissions  
Board File No.: EB-2017-0319**

---

Please find enclosed the Ontario Sustainable Energy Association's Written Reply Submission in the above-noted matter.

Yours truly,



Robert Woon  
Encl.

cc: Dan Goldberger, OSEA  
Marion Fraser, Fraser & Company

Document #: 1412290

## **ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B).

**IN THE MATTER OF** an Application by Enbridge Gas Distribution Inc. for an order or orders relating to its Renewable Natural Gas Enabling Program and Geothermal Energy Service Program.

**AND IN THE MATTER OF** an Application by Enbridge Gas Distribution Inc. for an order or orders amending or varying the rates charged to customers for the sale, distribution, transmission, and storage of gas commencing as of January 1, 2018.

### **WRITTEN REPLY SUBMISSION OF ONTARIO SUSTAINABLE ENERGY ASSOCIATION**

August 28, 2018

---

1 Enbridge Gas Distribution Inc. (“Enbridge”) brought an application seeking the approval of the Ontario Energy Board (“Board”) for Enbridge’s Renewable Natural Gas Enabling Program and Geothermal Energy Service Program (the “Application”).

2 On July 26, 2018, Enbridge requested that the portion of its Application relating to the Geothermal Energy Service Program be held in abeyance given the Government of Ontario’s decision to dismantle GreenOn. The Board approved Enbridge’s request.

3 OSEA’s intervention in Enbridge’s application was primarily focused on the Geothermal Energy Service Program aspect of the Application. Given the abeyance of

this portion of the Application, OSEA is providing the following brief submissions on the Renewable Natural Gas Enabling Program only.

4 Pursuant to Procedural Order No. 4 dated July 23, 2018, OSEA wishes to comment on the applicability of the undertakings provided to the Lieutenant Governor in Council and the directives to the Board as they relate to the Renewable Natural Gas Enabling Program.

5 OSEA agrees with Enbridge's Argument in Chief that the undertakings and directives were meant to expand the scope of Enbridge's permitted business activities to help the Government of Ontario meet its energy conservation goals.<sup>1</sup> The 2006 and the 2009 Directives make clear that their purpose are to allow the Board to take steps to "promote energy conservation, energy efficiency, load management and the use of cleaner energy sources including alternative and renewable energy sources."<sup>2</sup>

6 The Government of Ontario's recent decision to dismantle the province's Cap and Trade does not eliminate the need for energy conservation and the use of alternative and renewable energy sources. The federal Pan-Canadian Framework on Clean Growth and Climate Change requires the Government of Ontario to reduce greenhouse gas emissions through carbon pricing. Cap and Trade is not the only method to address greenhouse gas emissions.

7 Further, the Government of Ontario's proposed bill to repeal the *Climate Change Mitigation and Low-carbon Economy Act, 2016* and wind down the Cap and Trade Program (Bill 4) demonstrates that the Government of Ontario will be taking any steps

---

<sup>1</sup> Enbridge, Argument in Chief dated August 7, 2018 at paras 46-47.

<sup>2</sup> OIC 1537/2006; OIC 1540/2009.

to address greenhouse gas emissions in the province. Bill 4 requires the Government of Ontario to establish targets for greenhouse gas emissions and to prepare a climate change plan.

8 OSEA supports the development of a market to supply renewable natural gas and Enbridge's involvement in same. As an operator of natural gas pipelines in Ontario, Enbridge is in a position to ensure that the early development of renewable natural gas meets all safety and quality requirements. OSEA is agreeable with Enbridge's use of the EBO-188 methodology to ensure that there is no cross-subsidization by existing ratepayers.<sup>3</sup>

9 As a major proponent of the *Green Energy Act* and renewable energy, OSEA supports Enbridge's proposed Renewable Natural Gas Enabling Program. OSEA understands that the development of a new market requires an enabling program to reduce negative impacts and costs on proponents.

Document #: 1412235

---

<sup>3</sup> Enbridge, Argument in Chief dated August 7, 2018 at para 51.