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September 6, 2019

**VIA RESS & COURIER**

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

Dear Ms. Walli:

**Re: Consultation to Review Enbridge Gas Inc.'s Natural Gas Supply Plan  
Board File No.: EB-2019-0137**

We are counsel to Anwaatin Inc. (**Anwaatin**). Please find enclosed Anwaatin's written questions to Enbridge Gas Inc. in the above-noted proceeding, filed pursuant to the Board's letter dated July 25, 2019.

Sincerely,

A handwritten signature in black ink that reads "Jonathan McGillivray". The signature is fluid and cursive, with the first name being particularly prominent.

Jonathan McGillivray

- c. Brandon Ott, Enbridge Gas Inc.  
David Stevens, Aird & Berlis LLP  
Larry Sault, Anwaatin Inc.  
Don Richardson, Shared Value Solutions Ltd.

## **ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act*,  
1998, S.O. 1998, c. 15, Sched. B, as amended;

**AND IN THE MATTER OF** the consultation with  
respect to Enbridge Gas Inc.'s (**Enbridge's**) five-year  
natural gas supply plan (the **Plan**).

**EB-2019-0137**

**WRITTEN QUESTIONS FROM  
ANWAATIN INC.**

**September 6, 2019**

**Question:**     **Anwaatin.1**

**Reference:**     • Plan, pp. 106-107

**Preamble:**     The majority of First Nations in Ontario do not have access to natural gas, and many First Nations are interested in accessing natural gas for energy cost savings and low-emission heating. The recently enacted *Access to Natural Gas Act, 2018*, SO 2018, c 15 (**Bill 32**) provides a framework for regulations to deliver rate protection for consumers or prescribed classes of consumers with respect to costs incurred by natural gas distributors in making a qualifying investment for the purpose of providing access to a natural gas distribution system to those consumers by reducing the rates that would otherwise apply in accordance with the prescribed rules.

- a) Please describe in greater detail the impacts Enbridge expects Bill 32 will have on its Plan and its adherence to the principles of cost effectiveness, reliability, and achieving public policy objectives.
- b) How does Enbridge's Plan ensure that it supports and is aligned with the public policy objectives of Bill 32 and, in particular, the expansion of natural gas access to First Nation reserve communities and off-reserve First Nation members?
- c) What impacts will the Plan have on the cost of natural gas to First Nation reserve communities and off-reserve First Nation members?
- d) What impacts will the Plan have on the expansion of natural gas distribution services to First Nation reserve communities and off-reserve First Nation members? Please provide specific expansion strategy and geographic plans.
- e) Does Enbridge have plans to introduce low-income rate assistance for First Nation reserve communities and off-reserve First Nation members into its Plan and business activities broadly? If so, please provide details. If not, please explain why not.

**Question: Anwaatin.2**

Reference: • Plan, pp. 30, 39, 106

Preamble: The Enbridge rate zone does not have access to any significant local natural gas production within its franchise area, with less than 1% of its annual gas supply requirement locally produced within Ontario.

“RNG is an alternative to conventional gas supply and can be stored, transmitted and distributed when connected to existing natural gas infrastructure. RNG is produced by capturing methane that results from the decay of organic matter. Some examples of RNG sources include landfills and wastewater treatment plant gas.

The Provincial Government’s recent Made-in-Ontario Environment Plan (“MOEP”) includes a requirement for natural gas utilities to offer voluntary RNG to customers. EGI is currently in the process of developing a voluntary RNG program in response to this policy.

At this time, EGI does not hold any RNG supply in its Plan. However, EGI remains committed to working with the provincial and federal governments, as well as other organizations, to offer services that will support government policies and objectives.”

- a) Please confirm that the “voluntary RNG program” referenced on page 39 of the Plan is the program for which Enbridge Gas Distribution Inc. received the Ontario Energy Board’s approval in EB-2017-0319.
- b) What are Enbridge’s plans for introducing RNG supply into its Plan? Please address, in detail, the anticipated timelines, quantities, locations, and impacts of RNG supply in relation to the Plan.

**Question:**     **Anwaatin.3**

Reference:     • Plan, pp. 6-8

Preamble:     The Plan may inform or underpin strategic, higher level decisions in relation to natural gas supply, storage, and transportation.

In its [Decision and Order on Enbridge Gas Distribution Inc.'s in EB-2017-0319 dated October 18, 2018](#), the Ontario Energy Board confirmed that “strategic, higher level decisions can trigger the duty to consult” First Nation and Métis communities (p. 25)

- a) Please describe and provide evidence for whether — and, if so, how — Enbridge determined, interpreted, and applied:
- (i) its procedural requirements;
  - (ii) the Crown’s procedural requirements; and
  - (iii) the Ontario Energy Board’s procedural requirements;
- in assisting the Crown in fulfilling its duty to consult and accommodate the First Nation and Métis communities in relation to the Plan.

**Question: Anwaatin.4**

Preamble: Liquefied natural gas (LNG) services and distribution facilities are beginning to play a role in natural gas distribution in Ontario.

Enbridge (formerly Union Gas) operates a combination distribution, liquefaction and balancing service from Hagar, Ontario. The Hagar facility is located near the TransCanada Highway #17, between North Bay and Sudbury. The location expects to produce, for sale, between 500 and 700 bulk tank truckloads of LNG a year.

Nipigon LNG Corporation has proposed to build and operate a LNG plant in the Township of Nipigon. It will also construct a connecting pipeline to obtain natural gas from the nearby TransCanada Mainline for liquefaction at the plant. The LNG will then be trucked from the plant to LNG depots at industrial locations where it will be converted into natural gas for distribution within the customer's property. Please see [EB-2018-0248](#) for additional information.

- a) What are Enbridge's plans for introducing LNG supply into its Plan?
- b) What role does LNG play in natural gas expansion programs related to Bill 32, or otherwise?

**Question: Anwaatin.5**

Preamble: Across Ontario, Enbridge natural gas infrastructure traverses First Nation treaty lands, as well as reserve lands. Municipal Franchise Agreements are a mechanism for easement agreements between municipal governments and Enbridge.

- a) What agreements does Enbridge envision between First Nation governments and the company to support its Plan, while ensuring that First Nation easement and rights-of-way petitions do not delay service expansions, or cause increased costs to ratepayers?

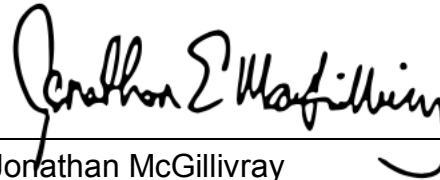
ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS

6<sup>th</sup> day of September, 2019.



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Lisa (Elisabeth) DeMarco  
DeMarco Allan LLP  
Counsel for Anwaatin



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Jonathan McGillivray  
DeMarco Allan LLP  
Counsel for Anwaatin