



Ms. Christine Long  
Registrar and Board Secretary  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

**Re: EB-2019-0137 Draft OEB Staff Report on Enbridge's Natural Gas Supply Plan – Equinor Natural Gas' Comments.**

Dear Ms. Long,

Please find enclosed Equinor Natural Gas LLC's written comments on the OEB Staff Report on the consultation on Enbridge's Natural Gas Supply Plans.

Respectfully submitted on behalf of Equinor Natural Gas.

Original signed by

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Elizabeth Perreca

Elizabeth Perreca  
Legal Counsel  
Equinor Natural Gas LLC  
120 Long Ridge Rd, Suite 3E01  
Stamford, CT 06902

[elpe@equinor.com](mailto:elpe@equinor.com)

January 14, 2020

Ontario Energy Board  
2300 Yonge Street  
Toronto, ON  
M4P 1E4



**Attention: Christine Long  
Registrar and Board Secretary**

Dear Ms. Long:

**Re: Ontario Energy Board: EB-2019-0137 - Consultation to Review Enbridge Gas Inc. - 5 Year Gas Supply Plan**

Further to the correspondence of the Ontario Energy Board ("OEB") dated July 25, 2019 setting forth a consultation process for the five-year natural gas supply plan (the "**Plan**") of Enbridge Gas Inc. ("EGI"), and the correspondence of the OEB dated September 27, 2019, and the Draft OEB Staff Report to the OEB: Consultation to Review Natural Gas Supply Plans dated December 19, 2019, the following comments are submitted by Equinor Natural Gas LLC ("Equinor") (as an intervener in this proceeding) to be addressed by the OEB.

**Equinor respectfully submits the following comments and questions regarding the OEB Staff Report:**

Equinor acknowledges that the task of compiling and analyzing a five-year natural gas supply plan is difficult and requires a lot of attention to detail. Specifically, Equinor recognizes that it would be hard for the OEB to provide detailed analysis of every aspect of the Plan and respects the amount of time and effort the OEB and Enbridge have put into this process already. The purpose of this response is to suggest improvements that would make the consultation process more meaningful in future iterations.

Equinor would like to address the role of stakeholder involvement in the gas supply plan consultation process. Throughout this process stakeholder involvement has been emphasised and encouraged by the OEB, however, despite the numerous comments and suggestions submitted, Enbridge did not make a single amendment to their plan. None of the stakeholder's comments or suggestions were implemented in the plan. Equinor and many other intervenors laid out initial questions and concerns that were not alleviated by either Enbridge or the OEB. Equinor suggests that in future consultation processes and supply plans, better care should be taken to address stakeholder concern to increase the value of the stakeholder's involvement. Perhaps the party submitting the plan and the OEB should note stakeholder concerns in an appendix and create a road-map for how those concerns will be addressed in the future.

Based on the OEB's own principles, gas supply plans are most effective when they are based on objective evidence to support Enbridge's conclusions. A way to achieve this goal in the future is to ensure plans are accompanied with better evaluation matrices and scorecards, with clear and transparent methods to objectively assess the metrics. It was our hope that the consultation process would provide objective information and evidence that was missing in the Plan, however our requests for evidence were never answered. Equinor agrees with Pollution Probe's suggestions concerning the scorecard and believes that a better scorecard would make stakeholder engagement more valuable and result in better gas supply plans. Equinor adds that a better evaluation matrix would further assist in this effort. In the future, the evaluation matrix and scorecard should be tools used by the party submitting a gas supply plan to *objectively* support its arguments and decisions. For example, when Equinor noted that Delivered Service was not adequately considered as part of the Plan, Enbridge could have provided objective support for their evaluation matrix conclusions

answers in the Gas Supply Plan. Without objective evidence, Equinor cannot reconcile the conclusions in Enbridge's gas supply option analysis versus Equinor's perspectives on the guiding principles:

1. Regarding cost-effectiveness, Equinor's supply would be the lowest cost alternative to new transportation contracting. Given the cost to rate-payers to choose a more costly option, quantitative evidence should be required for the other guiding principles of reliability, flexibility, and public policy).
2. Regarding reliability, Enbridge provided no objective evidence to support its 'reliability' concerns. It is our view that there have been no reliability issues with Firm Baseload Delivered Supply.
3. Regarding flexibility, Enbridge noted that it did not require supply year-round. Equinor is very flexible in its offerings and has continually suggested such. It has and will continue to provide supply offerings that are in any form Enbridge wishes, including long-term offerings that are not 'year-round'.
4. Regarding diversity, Enbridge is currently reducing supply diversity by reducing delivered supply.
5. Lastly, existing transport is superior to new build supply, and it is concerning that this is not part of the decision process.

As a result of an ineffective scorecard and evaluation matrix, Enbridge did not answer Equinor's concerns regarding Delivered Supply. On page 35 of the OEB Staff Report, Staff supports the limit of Delivered Supply at the EGD rate zone to just 2% in order to protect against non-delivery of Delivered Supply. Equinor understands that Enbridge must be very mindful of the risks with its supply choices, however, Equinor requested multiple times throughout the consultation process that Enbridge provide objective evidence to support their concerns around Delivered Supply. Specifically, Equinor requested that Enbridge provide actual evidence to support that Delivered Supply is unreliable. A more robust and useable scorecard and evaluation matrix could have been used in this instance to guide Enbridge's response to Equinor. Further, a robust scorecard could have been used to streamline responses to each stakeholder and ensure the appropriate analysis was provided to each question, service, and concern.

Overall, if the Plan or future gas supply plans are accompanied by a more robust and objective scorecard and evaluation matrix, Enbridge would be able to provide objective evidence to stakeholders and alleviate their concerns while helping the consultation process be more meaningful in the future.

Sincerely yours,

Elizabeth Perreca  
Legal Counsel  
Equinor Natural Gas LLC  
120 Long Ridge Rd, Suite 3EO1  
Stamford, CT 06902  
elpe@equinor.com  
Stamford, CT 06902

cc: Enbridge Gas Inc.