

May 8, 2020

VIA RESS

Ms. Christine E. Long
Registrar and Board Secretary
ONTARIO ENERGY BOARD
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Dear Ms. Long:

Re: EB-2020-0066 – Enbridge Gas Inc. (EGI) Voluntary RNG Program Application.
Industrial Gas Users Association (IGUA) Interrogatories for EGI.

Attached are interrogatories filed on behalf of IGUA. We have had a chance to review the interrogatories filed by other parties to date and have adjusted IGUA's interrogatories so as to avoid undue redundancy.

Yours truly,



Ian A. Mondrow

c: B. Ott (EGI)
D. Stevens (Aird & Berlis LLP)
S. Rahbar (IGUA)
Intervenors of Record

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ONTARIO ENERGY BOARD

**Application by Enbridge Gas Inc. (EGI) for a Voluntary
Natural Gas Program beginning January 1, 2021**

INTERROGATORIES

of

INDUSTRIAL GAS USERS ASSOCIATION (IGUA)

1. References & Preamble:

- (a) *ExA/T2/S1/p1, paragraph 3 ; ExB/T1/S1/p2, paragraph 6.* EGI's Application refers to the *Made-in-Ontario Environment Plan* as requiring natural gas utilities to implement a voluntary RNG option for customers.
- (b) *Made-in-Ontario Environment Plan*, page 33, 4th bullet. The Ontario government's *Made-in-Ontario Environment Plan* includes as an "Action";

Require natural gas utilities to implement a voluntary renewable natural gas option for customers.

Questions:

- (a) Has EGI received any correspondence or other documentation from the Ontario government requiring EGI to implement a voluntary renewable natural gas option for customers, other than the *Made-in-Ontario Environment Plan*?
- (b) If so, please file copies of any such correspondence or other documentation.

2. References & Preamble:

- (a) *ExA/T2/S1/paragraph 9.* The evidence addresses the recovery of direct costs for RNG, which are to be funded entirely by Voluntary RNG Program participants.
- (b) *ExB/T2/S3.* The evidence discusses EGI's marketing and communications activities in relation to the Voluntary RNG Program.

- (c) *ExB/T2/S4*. The evidence addresses additional Voluntary RNG Program costs.

Questions:

- (d) Please confirm that non-commodity program costs (capital and operating) for the Voluntary RNG Program will be expensed against EGI earnings during its current incentive rate plan period and will thus have the effect of reducing earnings otherwise available for earnings sharing (and, in this respect, will be recovered from all of EGI's customers).
- (e) In October 2018, Enbridge Gas Distribution received approval [EB-2017-0319] for a rate regulated RNG injection service, and associated rate (Rate 401). In respect of the RNG to be procured under the voluntary RNG program, who will pay for the injection of the RNG supplied to customers?

3. **Reference & Preamble:**

ExB/T2/S2/p1, paragraph 1. The evidence indicates some risk of net customer attrition from the voluntary program.

Question:

Please explain how the commodity cost of any RNG procured for customers leaving the program will be recovered in the event that customers joining the program in the relevant procurement period do not fully offset customers leaving the program in the applicable period.

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