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June 4, 2020

VIA E-MAIL

Ms. Christine Long
Registrar & Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0091 – Enbridge Gas Inc. Integrated Resource Planning Proposal
VECC Comments on Draft Issues List**

In accordance with Procedural Order #1 dated May 21, 2020 regarding Enbridge Gas Inc.'s Integrated Resource Planning Proposal (IRPP), VECC makes the following comments on the proposed General Questions and Specific Questions on the Draft Issues List.

General Questions

VECC supports the questions posed with the following addition.

VECC submits there should be an upfront general question that specifically asks if Enbridge Gas' capital infrastructure planning process and IRP proposal is sufficiently rigorous, comprehensive and robust (or if any amendments are required) to ensure appropriate alternatives are being thoroughly considered.

Although this requirement is reflected in the OEB's Report of the Board on the DSM Mid-Term Review¹ and could be seen as falling within the boundaries of draft Question #1, VECC submits given its importance to the development of a strong and complete IRP Policy Framework, it should be a stand-alone question.

VECC recommends the following general question be added:

Is Enbridge Gas' IRP proposal sufficiently rigorous, comprehensive and robust to ensure conservation and energy efficiency opportunities can be reasonably considered as alternatives to future capital projects?

Specific Questions

VECC supports the questions posed with the following additions.

¹ B-2017-0127/0128, Report of the Board: Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015-2020), November 29, 2018, pp. 6, 20-21.

In evidence Enbridge states, “This makes the need for an IRP policy framework clear. How does Enbridge Gas assess the alternatives and what are the risk assessments that are undertaken? What is the appropriate level of cost and risk that is optimal for natural gas customers?”²

The Draft Issues List includes one question (Question #11) related to customer risk: Is Enbridge Gas’ proposal that ratepayers would need to bear the risks of IRPAs not effectively reducing forecasted demand growth appropriate? This question addresses risk following implementation but does not specifically address risk as part of the upfront planning process.

VECC submits Question #8 should be expanded as follows to ensure that the appropriate level of cost and risk that is optimal for natural gas customers is considered as part of the planning process. VECC proposes the following addition:

Is Enbridge Gas’ proposed two-stage screening process for comparing IRPAs with other facility and non-facility alternatives, and determining whether to proceed with an IRPA, appropriate? Does the process optimize cost and risk for natural gas customers?

Enbridge Gas seeks acknowledgement of Advanced Metering Infrastructure (“AMI”) as an IRP enabling element and indicates it will bring forward in a separate proceeding a proposal that an AMI system be deployed across the legacy EGD rate zone and Union rate zones.

Given the need and potential costs to customers of this deployment, VECC submits the following question should be added: ***Is Enbridge Gas’ proposed IRP enablement through the installation of AMI appropriate?***

Yours truly,

(Original Signed By)

John Lawford

Counsel for VECC

Copy to: Enbridge Gas Inc. Regulatory Affairs