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

Dear Ms. Long,

**RE: EB-2020-0091 - London Property Management Association Submissions on Draft Issues List – Enbridge Gas Inc. – Integrated Resource Planning Proposal**

In Procedural Order No. 1 dated May 21, 2020, the Ontario Energy Board (“Board”) made provision for intervenors to file written submissions on the Draft Issues List that was attached as Schedule A to the Procedural Order. The following are the submissions of the London Property Management Association (“LPMA”) on the draft issues related to the Enbridge Gas Inc. (“EGI”) application.

LPMA submits that the Draft Issues List is generally appropriate, assuming that each of the issues is interpreted as being sufficiently broad in scope and not constrained in any way.

Although the Draft Issues List is generally appropriate, LPMA submits that the Board should consider the following wording changes and potential additions to the Draft Issues List.

1. Issue 5: LPMA submits that storage should be added as shown (highlighted) below. LPMA submits that the addition of storage is appropriate because storage plays a role in serving in-franchise peak demand, along with transmission and distribution assets.

Is Enbridge Gas’ proposed definition of IRP, and its goal for what IRP should accomplish (“reviewing and implementing alternatives that reduce natural gas in-franchise peak period demand growth to defer or avoid future transmission, **storage** and distribution system facility expansion/reinforcement projects”) appropriate?

2. Issue 5: As worded or as proposed above, Issue 5 appears to limit alternatives to reduce peak period demand growth. LPMA submits that the issue should be broadened to include the potential of reducing peak period demand rather than focusing solely on the growth in peak period demand. IRP should not be limited to new growth areas. Reducing peak period demand of existing customers that are served by storage, transmission and distribution assets may free up capacity for the addition of new customers and new service areas while eliminating or reducing the additional assets needed to serve the new customers and loads. This could be accomplished by eliminating the word “growth” in Issue 5.

3. Issue 5: As worded or as proposed above, Issue 5 appears to limit alternatives to reduce peak period demand growth associated with in-franchise demand. First, it is not clear if this in-franchise demand includes the wholesale customers such as Kitchener Utilities or EPCOR. Second, because a significant portion of the transmission demand on the EGI system is related to ex-franchise demand, LPMA submits that either the “in-franchise” should be removed from Issue 5 or “and ex-franchise” should be added

explicitly to Issue 5. Alternatively, a separate issue could be added that deals with ex-franchise peak period demand.

LPMA believes that ex-franchise demand should be added because it is often this demand that results in expansions to the Dawn to Parkway transmission system. Because the addition to transmission capacity (whether it be pipe or compressors) is often lumpy, in-franchise customers absorb costs associated with any capacity that is in excess to the ex-franchise requirements. In addition, because the assets generally have a life in excess of the contract terms associated with ex-franchise requirements, in-franchise customers could be saddled with excess capacity and costs in the future if ex-franchise requirements decline in the future.

4. Issue 6: Rather than as currently worded, LPMA submits that it would be more inclusive of what projects would be screened by changing the wording to:

“Which types of facility projects do not require consideration of Integrated Resource Planning Alternatives (IRPAs) based on Enbridge Gas’ proposed screening criteria and is the criteria appropriate?”

5. Issue 7: LPMA submits that the current wording may be too restrictive of what activities/projects would be eligible for consideration. This may limit new ideas, technologies and approaches that could hinder effective IRP. LPMA suggests the wording below to replace Issue 7.

“What activities/projects (IRPAs) should not be eligible to included within an IRP? Should DSM related activities be allowed as an IRPA activity/project or should DSM related activities be excluded from eligible IRPAs?”

6. Issue 9: LPMA submits that timing should be added to this issue (highlighted), as follows.

“Is Enbridge Gas proposed methodology **and timing** for seeking OEB approval and proceeding with an IRP/IRPA appropriate?”

7. Issue 11: LPMA submits that the wording needs to be changed (highlighted) to ensure that the utility is held accountable for its actions. Also, as noted in #2 above, LPMA submits that the word “growth” should be removed from this issue.

“Is Enbridge Gas’ proposal that ratepayers would need to bear the risks of IRPAs not effectively reducing forecasted demand appropriate **and what is the responsibility of Enbridge Gas in obtaining the expected reduction in demand?**”

Alternatively, this issue could be re-worded as follows:

“What is the appropriate sharing of risks of IRPAs not effectively reducing forecasted demand and should this sharing of risk be determined on an IRPA by IRPA basis?”

8. Who does the IRP/IRPA apply to? As currently worded, the proposals are limited to EGI. Should any policy or guidelines that result from this application be applicable to other rate-regulated natural gas utilities in Ontario?

9. While it may be covered in some of the issues, LPMA believes that there should be a recognition that fuel switching should be included in potential IRPs, including, but not limited to electricity, green energy (wind, solar, storage, etc.) and distributed energy resources. These distributed energy resources could include, but not be limited to, local Ontario production and renewable natural gas.

10. There does not appear to be any recognition in any of the issues that non-asset and/or asset solutions may be available from third party providers.

11. Similar to #10 above, there does not appear to be any recognition in any of the issues of whether a particular IRP or IRPA should be regulated or unregulated, and if the latter, what should be the role, if any, of the utility in the unregulated IRP or IRPA activity/project.

12. There may be an overlap in some areas between IRP/IRPAs and DSM. In each instance where this happens or has the potential to happen, there should be some guidance as to whether the overlap should be part of an IRP/IRPA or as part of DSM to make sure it does not end up in both. This may or may not be covered under #5 above.

Yours very truly,

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