

June 4, 2020

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

Dear Ms Long

Re: EB 2020-0091 Enbridge IRP – GEC Comments on Proposed Issues List

GEC supports the inclusion of the issues proposed by Board Staff and we propose the following additional issues:

1. Planning Process and Timing: What mechanisms are needed to ensure adequate lead time for consideration and implementation of cost-effective resources that may require additional lead time (e.g. DSM).

Rationale: In past proceedings Enbridge has indicated that the need date for supply was too close to allow for demand reduction efforts to reliably meet forecast needs. Accordingly, it is important to ensure supply planning timelines allow for alternatives to be developed.

2. What incentives and regulatory requirements are appropriate to ensure optimal integrated resource planning outcomes?

Rationale: Utilities earn return on capital investments. Enbridge or its affiliates also earns return on upstream investments and commodity. Accordingly, absent suitable incentives, or other suitable regulatory requirements, the company will have a disincentive to pursue non-pipeline alternatives.

3. Assessment Criteria and Methodology: What criteria and methodology should be used to assess resource options and choose between them? What policy goals, costs, risks, and benefits should be accounted for?

Rationale: For example, how should the company ensure that supply expansion is not in conflict with GHG reduction policies? Should externalities be monetized in IRP analyses, and if so, which externalities? How should non-monetized externalities and

risks be captured in IRP analyses? It will be important for all parties to understand in advance who will bear forecast risks of underutilized supply investments. For e.g., how should the risk of stranded assets be considered should demand decline?

4. How should fuel switching and coordination with electricity efficiency efforts be considered in IRPs?

Rationale: The IRP framework should ensure that policy goals are served and that scope and scale efficiencies are captured due to timely and effective coordination of multi-fuel energy efficiency investment and fuel switching.

5. In what manner should extra-provincial load and load reduction be considered in IRP?

Rationale: Given local socialized costs, it may be appropriate to evaluate a project differently if it would not be justifiable based solely on domestic distribution needs.

6. Are current energy and demand forecasting methodologies and capabilities and efficiency potential analyses appropriate to support IRP?

Rationale: Appropriate forecast timeframes, metering capabilities and demand reduction analyses are needed to support optimal IRP.

All of which is respectfully submitted,

Sincerely,

A handwritten signature in black ink, appearing to read 'David Poch', with a stylized flourish at the end.

David Poch
Cc: all parties