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June 4, 2020

BY RESS And EMAIL

Ms. Christine Long
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long:

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

In accordance with the Ontario Energy Board's ("OEB" or "Board") Procedural Order No. 1, dated May 21, 2020, this is Enbridge Gas Inc.'s ("Enbridge Gas") written submission on the Draft Issues List attached as Schedule A to the same. Generally, Enbridge Gas supports and agrees with the approach and proposed issues identified by OEB Staff in its Draft Issues List. The Draft Issues List includes appropriate draft issues to allow for review of Enbridge Gas's Integrated Resource Planning ("IRP") Proposal and to establish an IRP policy framework to guide Enbridge Gas's assessment of IRP alternatives ("IRPAs"), relative to other facility and non-facility alternatives, to serve the forecasted needs of Enbridge Gas customers. Enbridge Gas interprets all draft issues as recognizing: Enbridge Gas's obligation to serve the firm contractual peak period (peak hour or design day) demands of its customers; and, the need to consider the impacts upon Ontario's other energy infrastructure (e.g. electricity generation, transmission and distribution) resulting from investment in IRPAs.

Enbridge Gas supports the approach taken in the Draft Issues List that does not conflate Enbridge Gas's IRP Proposal with matters more appropriately dealt with through other proceedings such as Enbridge Gas's: (i) forecasting methodologies; (ii) gas supply plan and planning principles; (iii) annual rate setting applications; (iv) asset management plan; (v) project-specific leave to construct applications; (vi) Post-2020 Demand Side Management Framework or DSM Plans; or (vii) transmission and storage optimization and operations. Though aspects of these matters necessarily relate to Enbridge Gas's IRP Proposal and will contribute to the OEB's review of the same, this proceeding should not be used as a means of re-hearing matters previously decided by the Board or to address matters that are actively before the Board in other proceedings.

Enbridge Gas recommends that issue twelve (12) be broadened to reflect its intention that, based on the results of its annual IRP report, Enbridge Gas may seek approval to

adjust investments in IRPAs previously approved by the Board (e.g. to shift funding to an alternate IRPA or to increase/decrease/cease investment in IRPAs).¹

12. Is Enbridge Gas' proposal to monitor and report on IRPAs through an annual IRP report, and to seek approval to adjust any previously approved investments in IRPAs based on the results of such reporting, appropriate?

If you have any questions, please contact the undersigned.

Sincerely,

[original signed by]

Adam Stiers
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c.c.: David Stevens (Aird & Berlis)
Michael Parkes (OEB Staff)
Michael Millar (OEB Counsel)
EB-2020-0091 (Intervenors)

¹ EB-2020-0091, Exhibit A, Tab 13, pp. 16-18.