

Sent by Email

June 4, 2020

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Christine Long, Board Secretary

Dear Ms. Long:

**Re: Board File No. EB-2020-0091 – Enbridge’s IRP Proposal
OSEA Submissions on Draft Issues List**

On May 21, 2020, the Board provided a Draft Issues List for comment for EB-2020-0091. The Ontario Sustainable Energy Association (“OSEA”) is pleased to provide its comments on the Draft Issues List. OSEA’s comments are enclosed.

Yours truly,



Raeya Jackiw

cc: Dan Goldberger, OSEA
Kerry Lakatos-Hayward, NewEnergyCustomer

Encl.

Document #: 1753895

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), as amended

AND IN THE MATTER OF the Ontario Energy Board's proceeding on Enbridge Gas Inc.'s Integrated Resource Planning (IRP) Proposal

WRITTEN SUBMISSION OF ONTARIO SUSTAINABLE ENERGY ASSOCIATION

June 4, 2020

I. GENERAL QUESTIONS

A. COMMENTS ON ISSUE 3

Does Enbridge Gas' IRP proposal necessitate consequential changes to any other OEB policies, codes or guidelines? If so, which policies or guidelines might be affected, and how should these consequential changes be considered within the scope of this proceeding?

1 OSEA would like to clarify whether Issue 3 captures guidelines related to DSM avoided cost. Enbridge Gas argues that IRP should be evaluated separately from DSM, because the programs differ in design and costing parameters between peak hour, design day demand and average annual demand. OSEA believes that it is appropriate for the scope of this proceeding to include a review of what avoided cost and demand reduction calculations should be used for DSM technologies that impact peak demand and can be used in IRP.

2 If Issue 3 does not capture DSM avoided cost considerations, OSEA proposes a new issue as follows:

What demand reduction assumptions are appropriate for gas DSM measures that could be used in IRPAs to reduce Peak Demand?

B. ADDITIONAL PROPOSED ISSUE

3 OSEA has an interest in understanding how Enbridge Gas' IRP program promotes carbon reduction and addresses climate change. As such, OSEA proposes the following additional issue:

Does Enbridge Gas' IRP proposal conform to federal and provincial approaches to climate change and carbon reduction?

II. SPECIFIC COMPONENTS OF ENBRIDGE GAS' IRP PROPOSAL

4 Enbridge Gas has indicated that Advanced Metering Infrastructure (AMI) is a key enabler of IRP in understanding actual hourly customer consumption data and assessing whether IRPA measures have effectively delivered peak hour energy savings. In its IRP proposal, Enbridge Gas indicates that it will propose that an AMI system be deployed across the legacy EGD Rate Zone and Union Rate Zone in a separate proceeding. With this context, OSEA proposes the following additional issue:

What enabling technology is required, if any, to allow Enbridge to appropriately measure reductions to peak day and peak hour forecasts? Should Enbridge be required to expedite a proposal for deployment of AMI in a separate proceeding?

5 OSEA also proposes the following additional issues:

What changes to Enbridge's demand-supply planning and asset management processes and plans are required to appropriately evaluate IRPAs?

What collaboration should occur between the gas and electric sectors in developing a combined gas and electric bulk system IRP?

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