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June 4, 2020

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto ON
M4P 1E4

Dear Ms. Long,

RE: EB-2020-0091 Enbridge IRP - Energy Probe Submission on the Proposed Issues List

In the EB-2020-0091 Enbridge IRP Proceeding Procedural Order No.1 the OEB invited Intervenor to comment by June 4, 2020, on the Issues List proposed by Board Staff. The purpose of this letter is to offer comments by Energy Probe Research Foundation (Energy Probe).

Energy Probe believes that the issues list as proposed contemplates a comparison of gas and non-gas alternatives in Enbridge Gas's IRP. The most likely non-gas alternative is electricity, either generated at a central generating station or generated by distributed generation. Enbridge Gas is a gas distributor and does not have expertise in electricity generation, distribution, or transmission. The evidence on the record is inadequate for the result contemplated by the issues list. It is possible that Enbridge Gas or some of the intervenors will file additional evidence, but it is unlikely that such evidence would be adequate for a robust comparison of gas and non-gas alternatives. Energy Probe believes that the proceeding should either be reconstituted to include electricity utilities and other interested parties, or it should be limited to the consideration of gas alternatives only, including gas DSM alternatives, but not other forms or sources of energy.

Energy Probe believes that, in view of the application and evidence filed by Enbridge Gas, the latter course of action is preferable at this time and that the IRP should be limited to consideration of gas and gas DSM alternatives and exclude non-gas alternatives. With that in mind, Energy Probe agrees with most of the issues proposed by Board staff with few exceptions.

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4. Is Enbridge Gas's IRP proposal consistent with industry best practice in Ontario and other jurisdictions?

Energy Probe believes that Issue 4 is too broad and vague. Energy Probe suggests that it should be specific by limiting it to gas distribution, transmission, and storage as shown below.

*4. Is Enbridge Gas's IRP proposal consistent with **gas distribution, transmission and storage** industry best practice in Ontario and other jurisdictions?*

13. Are there other components that should be included within Enbridge Gas' IRP proposal, but are not? If so, what are they?

Energy Probe believes that Issue 13 is vague and opens the case to consideration of not-gas alternatives. Energy Probe suggests that it be deleted.

Respectfully submitted,

Original signed by

Tom Ladanyi

Consultant representing Energy Probe