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June 4, 2020

VIA RESS

Ontario Energy Board
P.O. Box 2319 2300
Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Long:

**Re: Enbridge Gas Inc. (EGI)
2020 Federal Carbon Pricing Program Application
OEB File No.: EB-2019-0247**

We are counsel to Anwaatin Inc. (**Anwaatin**). In accordance with Procedural Order No. 2, please find attached the interrogatories of Anwaatin to EGI in the above-noted proceeding.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a long horizontal stroke that tapers to a point.

Lisa (Elisabeth) DeMarco

c. Adam Stiers and Tania Persad, Enbridge Gas Inc.
Larry Sault, Anwaatin Inc.
Don Richardson

Encl.

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an application by Enbridge Gas Inc. (**EGI**), for an order or orders for gas distribution rate changes and clearing certain non-commodity deferral and variance accounts related to compliance obligations under the *Greenhouse Gas Pollution Pricing Act*, S.C. 2018, c. 12, s. 186. (the **Application**).

EB-2019-0247

INTERROGATORIES

OF

ANWAATIN INC.

June 4, 2020

Question: **Anwaatin-1**

Reference: • Updated Application, p. 4, para 10

Preamble: EGI states that persons affected by the Application are the customers resident or located in the municipalities, police villages, **Indigenous communities and Métis organizations** served by EGI, together with those to whom EGI sells gas, or on whose behalf EGI distributes, transmits, or stores gas. [emphasis added]

- a) Please file any and all analysis EGI has performed in connection with how the Application will, or is anticipated to, affect Indigenous communities and Métis organizations
- (i) that EGI serves;
 - (ii) to which EGI sells gas (e.g., Six Nations Natural Gas); and
 - (iii) on whose behalf EGI distributes, transmits, or stores gas.

If EGI has not undertaken any such analysis, please explain why no such analysis has been undertaken, given paragraph 10.

- b) Does EGI believe that it has a duty to consult and potentially accommodate Indigenous communities with respect to the Application?

Question: **Anwaatin-2**

Reference: • Updated Exhibit A, p. 15

Preamble: The bill impact of the 2020 carbon charges for a typical residential customer with annual consumption of 2,400 m³ is an increase of \$47.07 per year in the EGD rate zone. The bill impact of the 2020 carbon charges for a typical residential customer with annual consumption of 2,200 m³ is an increase of \$43.15 per year in the Union rate zones.

The bill impact of the proposed 2019 FCPP-related deferral and variance account balance disposition for a typical residential customer with annual consumption of 2,400 m³ is \$21.85 in the EGD rate zone. The bill impact of the proposed 2019 FCPP-related deferral and variance account balance disposition for a typical residential customer with annual consumption of 2,200 m³ is \$16.58 in the Union South rate zone and \$16.01 in the Union North rate zone.

- a) Does EGI expect that the bill impacts outlined above will be experienced by Indigenous communities? If so, please explain how such bill impacts will be experienced in Indigenous communities. If not, please explain why not.
- b) Has EGI performed any analysis of the bill impact on Indigenous communities? If so, please provide the analysis. If not, please explain why no such analysis has been performed.
- c) Has EGI quantified the rate impact of the Application on Indigenous communities? If so, please provide the quantification of the rate impact and explain how it was quantified. If not, please explain why no such quantification was performed.
- d) What proportion of EGI's customers are members of Indigenous communities?
- e) Has EGI analysed how Indigenous customers living on- and off-reserves will be affected by the proposed carbon charge? If so, please provide the analysis. If not, please explain why no such analysis was performed.
- f) What proportion of EGI customers reside "on-reserve", as defined in the *Indian Act*?
- g) Can EGI identify prospective new EGI "on-reserve" communities and customers that will be served through future natural gas distribution expansions, and how the bill impacts will be experienced by those communities?

Question: **Anwaatin-3**

Reference: • Updated Exhibit B, Tab 1, Schedule 5
 • Updated Exhibit B, Tab 2, Schedule 5

Preamble: EGI forecasts the Total Customer-Related Costs in the EGD rate zone at
 \$623,193,070.

 EGI forecasts the Total Customer-Related Costs in the Union rate zone at
 \$402,913,513

- a) Please provide actual 2019 volumes delivered to Indigenous communities and the total customer-related costs of the Federal Carbon Charge for Indigenous communities in the EGD Rate Zone.

- b) Please provide actual 2019 volumes delivered to Indigenous communities and the total customer-related costs of the Federal Carbon Charge for Indigenous communities in the Union Rate Zone.

Question: **Anwaatin-4**

Reference: • Updated Exhibit C, pp. 13 and 16


Preamble: EGI's forecasted 2020 administration costs are \$3.54 million: \$2.0 million for the EGD rate zone and \$1.54 million for the Union rate zones (IT billing system, staffing resources, consulting and external legal support, greenhouse gas (**GHG**) reporting and verification, bad debt, and other miscellaneous costs).

EGI plans to record actual 2020 costs in the Greenhouse Gas Emissions Administration Deferral Accounts (**GGEADAs**) until such time that these costs are incorporated into rates. EGI intends to seek recovery of its actual 2020 administration costs in a future proceeding.

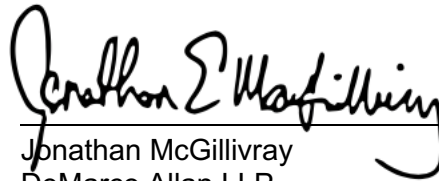
EGI states that it anticipates that it will incur a total of \$0.20 million in consulting and external legal costs in 2020 for work supporting the development and sustainment of EGI's carbon strategy and related analyses, the review and interpretation of any new or updated regulations associated with the GGPPA, including offsets, or other GHG or carbon pricing programs and for work supporting the development of Enbridge Gas's 2021 FCPP application and pre-filed evidence and associated OEB proceedings.

- a) Please outline what additional consulting and external legal services EGI anticipates that it will require in relation to each of the following:
- (i) development and sustainment of EGI's carbon strategy and related analyses;
 - (ii) review and interpretation of any new or updated regulations associated with the GGPPA;
 - (iii) review and interpretation of any new offsets regulations associated with the GGPPA;
 - (iv) Indigenous engagement and consultation for the development and sustainment of EGI's carbon strategy and related analysis; and
 - (v) other GHG or carbon pricing programs.

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
4th day of June, 2020



Lisa (Elisabeth) DeMarco
DeMarco Allan LLP
Counsel for Anwaatin



Jonathan McGillivray
DeMarco Allan LLP
Counsel for Anwaatin