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June 11, 2020

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

Dear Ms. Long,

RE: EB-2020-0091 - London Property Management Association Additional Submissions on Draft Issues List – Enbridge Gas Inc. – Integrated Resource Planning Proposal

In Procedural Order No. 1 dated May 21, 2020, the Ontario Energy Board (“Board”) made provision for intervenors to file additional written submissions on the Draft Issues List that was attached as Schedule A to the Procedural Order in reply to the submissions of other parties that were filed on June 4, 2020. The following are the additional submissions of the London Property Management Association (“LPMA”) on the draft issues related to the Enbridge Gas Inc. (“EGI”) application.

With two exceptions which are noted below, LPMA generally agrees with the submissions of other parties in the proceeding. LPMA supports the additions and wording changes to the issues as proposed by a number of parties including the Vulnerable Energy Consumers Coalition, Environmental Defence, School Energy Coalition (“SEC”), Green Energy Coalition, Federation of Rental-Housing Providers of Ontario, Low-Income Energy Network, Pollution Probe and the Ontario Sustainable Energy Association.

LPMA shares the concern expressed by SEC, and others, that the proceeding is limited to considering, and either approving or rejecting, the Enbridge IRP proposal. LPMA agrees with the various parties that have indicated that a generic proceeding is a better use of time and resources of the Board, distributors and intervenors. As indicated in its own comments, LPMA believes the issues should be more generic in nature rather than focused on the EGI proposal. Like SEC and others, LPMA believes that to be effective, the scope of this proceeding should be broadened to include issues that may impact on IRPAs beyond those identified in the current draft issues list.

The Board may want to consider a section of the issues list that deals with the generic policy associated with IRP and a section of the issues list that deal with the specifics of the EGI proposal.

As noted above, LPMA generally agrees with the submissions of other parties with two exceptions. These two exceptions are the submissions of EGI and Energy Probe (“EP”).

With respect to the submissions of EGI, which are generally supportive of the draft issues list, LPMA has noted in its original submission and in this submission that the proposed draft issues list is too narrow in scope and needs to be broadened.

With respect to the submissions of EP, LPMA disagrees with EP’s stated belief that the proceeding should be limited to the consideration of gas alternatives only, including gas DSM alternatives, but not other forms

or sources of energy. EP's proposed wording changes for issues 4 and 13 are in keeping with this view that the proceeding should only deal with natural gas alternatives.

LPMA strongly disagrees with the submission of EP. LPMA does not consider "integrated" resource planning to be simply the integration of natural gas supply and natural gas demand. "Integrated" should encompass not only natural gas, but other forms of energy supply and demand, such as electricity, geothermal providers, renewables, local Ontario natural gas production, renewable natural gas, energy storage and anything else that could impact the peak day and peak hour demand for natural gas and the associated infrastructure needed.

LPMA notes the alternative in the EP submission that if the scope of the proceeding is not narrowed to only natural gas alternatives, then the proceeding should be reconstituted to include electricity utilities and other interested parties. LPMA submits that this would be preferable to the narrow scope envisioned by EP. The other interested parties, in the view of LPMA could include propane distributors, potential renewable natural gas providers, energy storage providers, energy equipment manufacturers, geothermal providers and others that may be able to provide insight into IRP solutions.

LPMA notes that the definition of "integrated" is "combining or coordination separate elements so as to provide a harmonious, interrelated whole" and "organized or structured so that constituent units function cooperatively". With the narrow scope envisioned by EP and EGI, there can be no coordination of the elements that could provide benefits and solutions for IRP.

Yours very truly,

Randy Aiken

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