



BY EMAIL and RESS

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June 11, 2020
Our File No. EB-2020-0091

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

Attn: Christine Long, Registrar and Board Secretary

Dear Ms. Long;

Re: EB-2020-0091 – Enbridge IRP – SEC Issues List Reply Comments

We are counsel for the School Energy Coalition. Pursuant to Procedural Order #1 in this proceeding, these are SEC's reply to comments on the Draft Issues List.

SEC notes that we have made detailed comments in our original submissions, including offering a full alternative Issues List. Our principal thrust is that the issues should not be limited to the specific Enbridge proposal, but should be more generic in nature. We stand by those submissions, and will not repeat them here.

Enbridge

The central point of the Enbridge submission is exclusion of all subjects that could possibly require them to do actual integrated resource planning. That is consistent with their longstanding practice of ignoring IRP until it is too late, then proposing significant capital spending on pipes because it is too late to do anything else.

So, Enbridge seeks to exclude any discussion related to:

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- (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.”

The fact that this leaves nothing left to be IRPAs is consistent with their preference for capital assets, and their many past statements that actually implementing IRP is impractical.

This is particularly inappropriate since Enbridge is asking for Board guidance on several of these components, such as how to set rates for IRPAs, and how to include IRPAs in leave to construct applications, and how to consider DSM alternatives to pipes. In fact, Enbridge in their submissions specifically contemplate this this proceeding will “establish an IRP policy framework”, but they would like the Board to do so without considering essentially all of the relevant policy issues.

SEC submits that the Board should reject these submissions by Enbridge.

Green Energy Coalition and Environmental Defence

SEC agrees in principle with most of the submissions of GEC and ED, which we believe are consistent with the alternative issues list SEC proposed. However, we would like to specifically call out that the “Incentives and Requirements” issues they have raised (GEC #2 and ED #3) do not include the other important component of that, allocation of risk. As SEC has noted in our original submissions, allocation of risk of poor planning, including overbuilding, to the shareholders is a key aspect of aligning Enbridge’s commercial interests to the best interests of customers.

London Property Management Association

LPMA has made a number of points with which we agree:

1. Issue 5 should include storage, should deal with demand, not demand growth, and should include ex-franchise demand.
2. Issue 9 should include timing of IRPA, consistent with our original submissions.
3. Fuel switching is a key part of IRP. SEC agrees with LPMA, and disagrees with Energy Probe, on this point (see below).

4. Third parties will often be the best providers of IRPAs.
5. Whether an IRPA is regulated or unregulated is a relevant issue. Enbridge appears to assume that any IRPAs are by definition regulated.

Energy Probe

SEC does not agree with Energy Probe that IRP should be limited to gas alternatives. While it is true that Enbridge is a gas distributor, and that is their core competency, the Board is not a gas distributor. The Board's mandate, for example in considering a proposed leave to construct, is to act in the public interest. It is in most cases not in the public interest to approve implementation of gas-based solutions to public needs that are better served by non-gas solutions.

Further, this is the issues list stage. What Energy Probe is proposing is that the Board not even consider whether non-gas alternatives are part of IRP. Energy Probe is free to argue, as a substantive matter, that the Board's policy on IRP should exclude non-gas alternatives. It is inappropriate to exclude that from the issues list altogether.

Low Income Energy Network

SEC agrees in principle with the two issues proposed by LIEN, although we believe they are already included in the Draft Issues List. They are certainly included in the issues list SEC proposed.

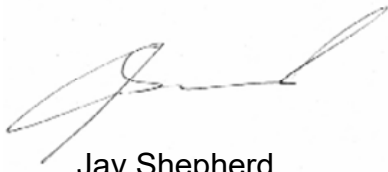
Conclusion

We have not commented on all of the submissions made by the parties, but have sought to identify some key items. Our overall submission continues to be that the alternative issues list put forward by SEC in our original comments is appropriate.

All of which is respectfully submitted.

Yours very truly,

**SHEPHERD RUBENSTEIN
PROFESSIONAL CORPORATION**



Jay Shepherd

cc: Wayne McNally, SEC (email)
Interested Parties