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June 26, 2020

Sent by EMAIL and RESS e-filing

Ms. Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
27-2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0091 – Enbridge Gas Inc. – Integrated Resource Planning Proposal
Submissions on Draft Issues List – EPCOR Natural Gas Limited Partnership
("ENGLP")**

On June 23, 2020, ENGLP filed a notice of intervention for the above-noted matter and indicated that it could provide comments on the current Draft Issues List, as attached to Procedural Order No.1, by no later than end of business day on Friday, June 26, 2020. The Board has not yet issued a decision on the request to intervene.

However, for the sake of expediency, should the Board grant ENGLP's request, we offer the following comments on the Draft Issues List:

ENGLP's comments are grouped as follows:

- ENGLP accepts the Draft Issues List
- Issues 2 and 3 – Approval requirement and OEB instruments applicable to other gas distributors as a result of the hearing
- Issue 13 – Other Considerations, Re: 'Electricity as an IRPA'¹

¹ This term was coined in OEB Staff's submissions on June 11, 2020. Energy Probe Research Foundation also refers to this concept in its submissions of June 4, 2020 using different language.

ENGLP Accepts the Draft Issues List

We accept the Draft Issues List as filed in this proceeding. The Draft Issues List is satisfactory to ENGLP and will provide sufficient scope in the hearing to permit ENGLP's concerns with respect to the integrated resource plan proposal and framework.

Issue 2 and Issue 3 – Approval requirement and OEB instruments applicable to other gas distributors as a result of the hearing

ENGLP supports the submissions of Board Staff with respect to these issues, particularly the importance and awareness of the potential for a decision, policy, or other direction of precedential value as part of the Board's decision(s) in this hearing which may apply to other natural gas distributors:

The Draft Issues List does not, in OEB staff's view, limit the OEB to considering only the proposal brought forward by Enbridge Gas. In particular, issues 2 and 3 in the Draft Issues List ("Does Enbridge Gas' IRP proposal require formal approval by the OEB? If so, what form should this approval take?"; "Does Enbridge Gas' IRP proposal necessitate consequential changes to any other OEB policies, codes, or guidelines? If so, which policies, codes or guidelines might be affected, and how should these consequential changes be considered within the scope of this proceeding?") recognize that **the outcome of this proceeding may involve more than a simple approval or rejection of Enbridge Gas's IRP proposal...**² (Emphasis added)

ENGLP intends to make submissions as appropriate on these issues to ensure that the Board may fully consider the intended and unintended impacts of a decision on other natural gas distributors and their customers.

Issue 13 – Other Considerations, Re: 'Electricity as an IRPA'

EPCOR has subsidiaries in Ontario which carry on both the business of natural gas distribution and electricity distribution. To the extent that electricity distribution interests are potentially affected by a decision in this proceeding, and as raised eloquently by several parties in their interventions and submissions on the Draft Issues List in this proceeding, ENGLP submits that 'Electricity as an IRPA' should therefore form part of the issues examined as part of this proceeding.

All of which is respectfully submitted

² EB-2020-0091, OEB Staff Submission on the Draft Issues List, at page 2, paragraph 2, dated June 11, 2020.

Sincerely,

Vince Cooney, P.Eng, MBA
Senior Manager, Regulatory Affairs, Ontario
EPCOR Utilities Inc.
(647) 730 – 0013

cc. all parties in EB-2020-0091