



Ontario  
Energy  
Board

Commission  
de l'énergie  
de l'Ontario

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# **DECISION ON ISSUES LIST AND PROCEDURAL ORDER NO. 2**

**EB-2020-0091**

## **ENBRIDGE GAS INC.**

**Integrated Resource Planning Proposal**

**BEFORE: Lynne Anderson**  
Presiding Member

**Michael Janigan**  
Member

**Susan Frank**  
Member

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**July 15, 2020**

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## 1 INTRODUCTION AND SUMMARY

Enbridge Gas Inc. (Enbridge Gas) originally submitted an Integrated Resource Planning (IRP) proposal to the OEB as part of its Leave to Construct Application for 10.2 km of pipeline expansion within the City of Hamilton (“Dawn-Parkway Expansion” proceeding, EB-2019-0159), filed on November 1, 2019. As part of that Application, Enbridge Gas requested that the OEB determine that its IRP Proposal, in relation to the Dawn-Parkway Expansion project, and for application to future Enbridge Gas projects, is reasonable and appropriate.

In Procedural Order No. 1 in the Dawn-Parkway Expansion proceeding, issued January 30, 2020, the OEB determined that Enbridge Gas’ IRP Proposal would be heard separately from the Leave to Construct application.

The OEB subsequently issued a Notice of Hearing on April 28, 2020, that initiated a review of Enbridge Gas’ IRP Proposal as a separate proceeding (EB-2020-0091), and invited intervention requests or letters of comment from parties who wish to participate in this proceeding.

On May 21, 2020, the OEB issued Procedural Order No. 1, which set out direction on intervenor status and cost eligibility, and provided a draft issues list for comment.

In this Decision and Procedural Order, the OEB provides further direction on the scope of the proceeding, approves a final Issues List, and establishes procedural steps for the next phase of this proceeding. The OEB has determined that this proceeding will include broad consideration of the definition and goals of IRP, and the process and approach for incorporating IRP into Enbridge Gas’s system planning process, including consideration of alternatives to Enbridge Gas’s IRP Proposal.

Given the OEB’s stated intention to establish an IRP Framework for Enbridge Gas, the next stage in this proceeding will provide an opportunity for both Enbridge Gas and other parties to file evidence (in addition to Enbridge Gas’s existing IRP Proposal) that will assist the OEB in addressing the issues on the Issues List and developing this IRP Framework.

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## 2 DECISION

### 2.1 Submissions on Draft Issues List

The OEB used a two-stage process to seek input on a draft issues list (Draft Issues List) developed by OEB staff. Enbridge Gas and approved intervenors were invited to file written submissions on the Draft Issues List. Following these submissions, all parties (including Enbridge Gas and OEB staff) then had an opportunity to provide additional comments regarding the submissions of other parties.

The following parties provided comments, through a submission on the Draft Issues List, a reply comment in response to the submissions of other parties, or both.

- Anwaatin Inc. (Anwaatin)
- Building Owners and Managers Association, Greater Toronto (BOMA)
- The City of Hamilton
- Environmental Defence
- Enbridge Gas Inc. (Enbridge Gas)
- Energy Probe
- EPCOR Natural Gas Limited Partnership (ENGLP)<sup>1</sup>
- Federation of Rental-housing Providers of Ontario (FRPO)
- Green Energy Coalition (GEC)
- Industrial Gas Users Association (IGUA)
- Low-Income Energy Network (LIEN)
- London Property Management Association (LPMA)
- OEB staff
- Ontario Sustainable Energy Association (OSEA)
- Pollution Probe
- School Energy Coalition (SEC)
- Vulnerable Energy Consumers Coalition (VECC)

The OEB has considered these comments in the development of the final issues list (Issues List). Comments from parties are discussed in the sections below, in relation to the OEB's findings on the overall scope of the proceeding and on specific issues in the Issues List.

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<sup>1</sup> Late submission, filed June 26, 2020

## 2.2 Scope of Proceeding

Many parties commented on the overall scope of the proceeding. These comments dealt with two separate but related topics:

- whether this proceeding is a generic proceeding on IRP or is specific to Enbridge Gas;
- how broadly the OEB will consider alternative approaches to IRP beyond Enbridge Gas's IRP Proposal in this proceeding.

### Generic Proceeding vs. Enbridge Gas Application

LPMA asked whether any policy or guidelines that result from this application should be applicable to other rate-regulated natural gas utilities. SEC submitted that the Issues List should treat this as a generic hearing on IRP. In contrast, Enbridge Gas submitted that this is not a generic hearing, and the Issues List should not be framed as such, commenting that "this case is about Enbridge Gas and how IRP should be introduced into its system and practices".

Related to the topic of whether this proceeding is relevant only to Enbridge Gas, the OEB received a late intervention request from EPCOR Natural Gas Limited Partnership (ENGLP), the other Ontario natural gas distributor rate-regulated by the OEB. ENGLP noted that it would like to better understand the IRP Proposal, including any issues which may arise regarding its precedential value to other Ontario natural gas distributors, and would make submissions as appropriate on these issues.

### Alternatives to Enbridge Gas's IRP Proposal

Enbridge Gas submitted that it "supports the approach taken in the Draft Issues List that does not conflate Enbridge Gas's IRP Proposal with matters more appropriately dealt with through other proceedings", such as forecasting methodologies, gas supply plan, rate setting, asset management plan, leave to construct applications, post-2020 Demand Side Management (DSM) Framework and Plans, and transmission and storage optimization and operations. Enbridge Gas noted that aspects of these matters relate to Enbridge Gas's IRP Proposal, but that this proceeding should not be used as a means of re-hearing matters previously decided by the OEB or matters before the OEB in other proceedings.

This framing of the scope of the proceeding was supported in the reply submission of BOMA, and opposed to some degree in the reply submissions of FRPO, GEC, LPMA, OEB staff, Pollution Probe, and SEC.

Several parties that expressed a preference for a broad scope of proceeding (Environmental Defence, FRPO, Pollution Probe, SEC) proposed reframing the Issues List for this proceeding in more general terms, as opposed to using Enbridge Gas's IRP proposal as the starting point. For example, Environmental Defence "recommends that the issues be recast to ask about the topic in general and not be restricted to Enbridge's proposal on the topic".

OEB staff submitted that the Draft Issues List did not limit the OEB to considering only the IRP Proposal brought forward by Enbridge Gas. Enbridge Gas noted that it expects that a review of alternatives to certain aspects of its IRP Proposal will be in scope without having to add to the Draft Issues List.

## Findings

Although this proceeding began as an application by Enbridge Gas, the OEB has determined that it is appropriate to consider IRP for Enbridge Gas on a broader basis than the specific proposal that has been filed. In addition, certain matters may have broader relevance to the Ontario natural gas sector beyond Enbridge Gas. The OEB is therefore granting ENGLP's request for intervenor status, to provide the opportunity for ENGLP to participate in or monitor the proceeding. An updated list of parties in this proceeding is attached as Schedule B to this Decision and Procedural Order.

The OEB agrees with several parties who recommended that the scope of this proceeding should include broad consideration of alternatives to Enbridge Gas's IRP Proposal. The OEB concludes that it is helpful for the issues to be expressed more simply and be broader in scope to reflect the OEB's intention to establish a general framework for IRP for Enbridge Gas. The OEB can then assess the extent to which Enbridge Gas's IRP Proposal is consistent with the determination for each issue. The OEB concludes that the broad wording of the issues in the final Issues List permits consideration of other components of IRP that were not in Enbridge Gas's IRP Proposal.

With the broader wording of the issues in the Issues List, the OEB concludes that most of the additional issues or refinements proposed by parties are not required, except as specifically discussed under each issue.

The OEB agrees that this proceeding is not the forum to duplicate matters being considered in other policy reviews, such as the Post-2020 DSM Framework for Natural Gas Distributors. However, it is in scope of this proceeding to consider how objectives for DSM, carbon abatement, asset optimization and other relevant OEB policies should be taken into consideration as part of IRP. The OEB notes that there is a requirement to include utility system plans and demand forecasts as part of rebasing rate applications, and the outcome of the IRP Framework should not result in duplicate effort. The OEB acknowledges avoiding duplication can be a challenge, and the OEB can issue further guidance if issues of overlap arise.

The OEB has noted a number of different terms being used within the overall process of IRP. The OEB intends to use the term IRP as encompassing of all of the activities. For clarity regarding terminology, the following terms are used in this Decision and Procedural Order regarding different components of IRP:

- **IRP Framework:** Guidance or requirements for IRP for Enbridge Gas established by the OEB.
- **IRP Plan:** A plan filed by Enbridge Gas in response to a system need. IRP Plans would follow the guidance established in the IRP Framework. The preferred IRPA (defined below) identified in an IRP Plan would be compared to one or more alternatives to demonstrate it is the best option.
- **IRP Alternative (IRPA):** A potential solution considered under the IRP Plan in response to a specific system need of Enbridge Gas. IRPAs determined by Enbridge Gas to be the preferred solution to meet the system need would likely be brought forward for approval from the OEB. The OEB notes that the potential Alternative solutions would also likely include consideration of a facility project.

## 2.3 Specific Issues

### Issue 1: Definition and Goals of IRP

Draft Issue 5 asked whether the proposed definition of IRP in Enbridge Gas's IRP Proposal, and its goal for what IRP should accomplish was appropriate.

FRPO and SEC proposed more general framing of these questions, asking what is integrated resource planning, and what is/are its goal(s).

LPMA submitted that IRP could also address reducing peak demand on an absolute basis, not just reducing growth in peak demand, and that the role of IRP in reducing ex-franchise demand (not just in-franchise demand) should also be considered. GEC also supported asking whether extra-provincial load and load reduction should be considered in IRP. Enbridge Gas opposed this submission.

LPMA, supported by SEC, also submitted that storage should be added to the types of facility projects that could potentially be avoided through IRP, because it plays a role in serving in-franchise peak demand, along with transmission and distribution assets, and that the potential roles of third-party providers and the unregulated utility business in providing IRPAs should be considered.

## Findings

The OEB concludes that the first issue should be to define and identify the goals for IRP, in the manner proposed by FRPO and SEC.

The OEB concludes that the separate issues raised by LPMA related to demand are not required because of the broad wording (shown below) of the final Issue 1.

The OEB does agree that IRP should include consideration of distribution, transmission and storage, as submitted by SEC and LPMA.

The OEB is not prepared to limit the discussion of IRP at this stage, therefore exploration of the appropriateness of categories of IRPAs that include utility and non-utility, regulated and unregulated solutions will be permitted.

Issue 1 is as follows:

*What is Integrated Resource Planning and what should the comprehensive goals of IRP be?*

## Issue 2: Incorporating IRP into Enbridge Gas's System Planning Process

Submissions on several topics are provided below, as the OEB will address them within this issue.

Draft Issue 1 addressed the responsiveness of Enbridge Gas's IRP Proposal to previous OEB direction and guidance.

Environmental Defence submitted that a specific reference to E.B.O. 169-III should be added, while Pollution Probe submitted that the OEB should provide a comprehensive draft list of references to previous OEB direction and guidance on IRP.

SEC submitted that whether a proposal responded to past direction is not the relevant question, as the “right answer” would likely go beyond past guidance, and perhaps be contrary to it. SEC proposed replacing this issue with “What is the appropriate process and approach, including both scope and consequences, that Enbridge [Gas] should use to incorporate IRP into its system planning process”? Many other parties also noted the importance of how IRP fits within Enbridge Gas’s system planning process.

Draft Issue 6 related to the screening criteria to be used to assess which types of proposed facility projects required consideration of IRP and IRPAs in the planning process.

SEC commented that starting with the assumption that there must first be a proposed facility project before IRP is considered is the wrong way around. SEC proposed changing this issue to identify the point in the planning process when non-pipes approaches should be considered.

In the context of several different issues in the Draft Issues List (or as new issues), many parties, including Environmental Defence, GEC, LPMA, OEB staff, and SEC, commented on the importance of the IRP process providing adequate lead time for adequate consideration of IRPAs as alternatives to facility projects.

## Findings

The OEB is adding a new issue that addresses the process and approach for incorporating IRP into Enbridge Gas’s system planning process.

The OEB agrees that it is important to consider previous OEB direction and guidance on IRP in establishing the appropriate process and approach going forward, but it is unnecessary to add that reference to the issue.

The OEB agrees with SEC that the first step in the planning process is not to identify a facility project and then to decide if an IRPA should be considered. The first step should be to identify the need. The need then leads to the consideration of the best approach to address the need. The process also must consider the lead time necessary for the implementation of IRPAs.



The consideration of the IRP process also includes general consideration of the timing and approach to stakeholder consultation regarding IRP Plans. The OEB considers First Nations and Métis communities to be key stakeholders in this regard. Consultation associated with IRP Plans is addressed further in Issue 6.

Issue 2 is now as follows:

*What is the appropriate process and approach for incorporating IRP into Enbridge Gas's system planning process, including scope, timing, stakeholder consultation, approval process and evaluation?*

### **Issue 3: IRP Approvals**

Draft Issue 2 addressed the approval needed from the OEB for Enbridge Gas' IRP proposal. Draft Issue 9 related to the methodology for seeking OEB approval for specific IRP Plans/IRPAs.

Few parties proposed modifications to the wording of these issues. SEC noted that the OEB should be clear on the statutory mandate it is exercising when it reaches its decision in this proceeding. SEC also noted that different IRPA proposals may require different approvals (e.g. leave to construct versus rates). LPMA suggested that the timing of approvals was also important and should be added to Draft Issue 9.

### **Findings**

The OEB agrees that it is important to determine the approvals of any IRP Plans that Enbridge Gas files or proposes as a consequence of the IRP Framework, and has included this as part of Issue 3. The different nature of approvals that might be necessary to implement an IRP Plan (depending on the IRPAs included in the IRP Plan), as proposed by SEC, is captured by this issue. Whether there is a need for any higher-level approval under the IRP Framework (similar to the approval of the IRP Proposal that Enbridge Gas requested in its application) is also included in this issue.

The broader question of the timing of approvals within Enbridge Gas's system planning process is included under Issue 2.

Issue 3 is now as follows:

*What, if any, OEB approvals are required under the IRP Framework, including for IRP Plans?*

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**Issue 4: Impact of IRP Framework on Other OEB Policies, Rules, and Guidelines**

Draft Issue 3 related to whether changes would be required to OEB policies, codes, or guidelines as a result of Enbridge Gas' IRP proposal.

Pollution Probe submitted that the OEB should develop a draft list of what policies, codes, or guidelines might be affected, and circulate this list for input. LIEN, LPMA, and SEC supported specifically addressing the interplay between IRP and the DSM Framework, including consideration of Enbridge Gas' position in the IRP Proposal that IRP should be reviewed and treated separately from DSM.

**Findings**

The OEB agrees that amendments to certain regulatory instruments may be appropriate as a consequence of an IRP Framework. Issue 4 will now consider what amendments should be contemplated and the approach to considering these amendments. The OEB notes that for natural gas the OEB establishes rules instead of codes, and the issue has been amended accordingly.

Issue 4 is as follows:

*Will the IRP Framework necessitate consequential changes to any other OEB policies, rules, or guidelines? If so, which policies, rules, or guidelines might be affected, and how should these changes be addressed?*

**Issue 5: Best Practices for IRP**

Draft Issue 4 was to assess whether Enbridge Gas's IRP Proposal is consistent with industry best practice. SEC proposed an amendment to identify what the industry best practices are.

**Findings**

The OEB has concluded that it is helpful to consider best practices for IRP in determining the approach to be used in Ontario. The objective is not to critique practices in other jurisdictions but to determine if there are approaches that should be adopted in Ontario.

Issue 5 is as follows:

*What are industry best practices for IRP, and how are they applicable to the Ontario context?*

### **Issue 6: IRP Alternatives: Eligible Activities, Screening, and Comparison**

Draft Issue 7 was related to what types of activities/projects (IRPAs) are eligible for inclusion in IRP.

Enbridge Gas noted a range of potential IRPAs, such as demand response, enhanced targeted energy efficiency, compressed natural gas, and low-carbon and non-gas solutions, including air source heat pumps and geothermal (both of which use electricity). Enbridge Gas also sought confirmation that non-gas alternatives can be included in the range of IRPAs.

Submissions on this issue focused on whether fuel switching solutions that use electricity should be an eligible IRPA. ENGLP submitted that “Electricity as an IRPA” should be an explicit issue. Energy Probe submitted that non-gas alternatives, including electricity, should be excluded. LPMA, OEB staff, and SEC submitted that electricity as an IRPA should remain eligible for consideration at this stage of the proceeding. Several other parties (GEC, OSEA, Pollution Probe) suggested greater integration and collaboration between gas and electricity planning.

Draft Issue 8 was related to the screening process for comparing IRPAs with other facility and non-facility alternatives. Enbridge Gas proposed a two-stage screening process; the first a high level review for reasonability and the second a more detailed evaluation.

FRPO noted that different screening criteria may be needed for different categories of alternatives. LIEN proposed adding a new issue to compare the cost and benefits for traditional supply-side infrastructure to non-pipeline alternatives. Environmental Defence proposed adding a new issue on the criteria and methodology to assess resource options.

VECC and Anwaatin emphasized the importance of risk as an evaluation criterion, and proposed an issue related to whether the evaluation process optimizes cost and risk for natural gas customers.

Anwaatin proposed a new sub-issue on whether the IRPA screening process includes adequate consideration of effective engagement and consultation with key stakeholders and First Nations, Métis communities, and Indigenous businesses. OEB staff noted the potential for location-specific impacts of IRPAs or infrastructure projects, and submitted that whether and how Enbridge Gas plans to engage and consult with impacted parties, in its comparison of IRPAs with infrastructure projects is important. More generally, Pollution Probe noted the importance of consultation on IRPAs, and alignment with municipal energy planning.

In its reply submission, Enbridge Gas submitted that the question of whether the IRPA screening process includes adequate consultation and engagement can be addressed within the existing Draft Issue 8, which asks whether Enbridge Gas's proposed screening process for IRPAs is appropriate. Enbridge Gas further submitted that no specific IRPAs are being proposed at this time, and thus the duty to consult is not triggered by the current application before the OEB.

## Findings

The OEB agrees that a key element of IRP is the approach to screening IRPAs, as well as the criteria and methodology used to evaluate and compare different IRPAs with one another and with facility projects. Included within this issue can be consideration of factors such as what avoided cost and demand reduction assumptions are appropriate for gas DSM technologies in the context of IRP, as suggested by OSEA, as well as what risks, costs, and benefits should be accounted for, as suggested by Environmental Defence. Risk is discussed further in Issue 8.

The OEB accepts the submission of FRPO that there may be different categories of IRPA and that the screening criteria may be different depending on the category. The question of whether non-gas alternatives, including electricity, should be eligible as IRPAs, is included within the scope of this issue.

Community impact may be a relevant criterion in comparing IRPAs and facility projects, and as such, consideration of stakeholder consultation in the development of IRP Plans is within scope of this issue. Stakeholders include First Nations and Métis communities. The OEB expects that the IRP Framework to be determined will not reference specific facilities/IRPAs, but may establish general procedures or guidance for stakeholder consultation on IRP Plans. To the extent any issues relating to the constitutional duty to consult arise in this proceeding, they will be considered. Where there are specific facilities/IRPAs that could impact on the duty to consult, the OEB would expect that this

would be considered in the proceeding (e.g. rate or leave to construct proceedings) for those facilities/IRPAs.

Issue 6 is as follows:

*What screening criteria and methodology should be adopted to evaluate and compare IRP Alternatives (IRPAs) with one another and with facility projects?*

### **Issue 7: Cost Recovery**

Draft Issue 10 addressed the treatment of costs associated with an approved IRP Plan. Submissions on this issue were limited to suggestions to reword the issue in a more general manner.

### **Findings**

Under Issue 7, the OEB will consider the recovery of costs associated with implementing an approved IRP Plan, and whether and how the IRP Framework should address recovery of IRP costs that are not associated with a specific IRP Plan, for example, the enabling investment in advanced metering infrastructure (AMI) that Enbridge Gas mentions in its IRP Proposal.

This scope of this issue includes the consideration of when and where cost recovery should be considered and who will pay for the costs (cost allocation).

Issue 7 is now as follows:

*What is the appropriate approach to the recovery of the costs resulting from an approved IRP Plan and the costs for additional investments to support IRP?*

### **Issue 8: Risk**

Draft Issue 11 related to the risks of IRPAs not effectively reducing forecasted demand growth appropriate. Enbridge Gas noted that the effectiveness of IRPAs remains uncertain, and that, should IRPAs not effectively reduce forecasted demand growth, Enbridge Gas may need to proceed with facility expansion/reinforcement projects even though ratepayers have already paid for an IRPA.

LPMA submitted that this issue should be revised to ask about the appropriate degree of risk-sharing between Enbridge Gas and ratepayers. SEC submitted that this issue should also consider whether, if the utility overbuilds infrastructure, Enbridge Gas should take some of the risk for the excess spending. Enbridge Gas opposed this suggestion.

As noted in the discussion on Issue 6, VECC and Anwaatin recommended including risk as a criterion in the methodology used to compare IRPAs and facility projects. Anwaatin also proposed a new sub-issue to Draft Issue 11 on whether Enbridge Gas's IRP Proposal adequately considers the circumstances of remote or near-remote Indigenous ratepayers that experience distinct and unique impacts of the cost of energy.

## Findings

The OEB agrees that matters such as the sharing of risk and the consequences for an IRP Plan that does not achieve the expected outcomes should be considered.

The OEB agrees that risk/reliability may also be relevant as part of the methodology used to compare IRPAs and facility projects (Issue 6), which could include any factors specific to remote or near-remote communities. The OEB does not consider it in scope of this proceeding on IRP to consider broad general matters such as energy poverty.

With respect to the risk associated with "over-builds" as raised by SEC, the OEB concludes that this should be dealt with on a case-by-case basis if this occurs, not as a general element of the IRP Framework.

Issue 8 is as follows:

*Who should bear the risk of an IRP Plan that does not accomplish its planned expectations and should there be consequences for not achieving planned expectations?*

## Issue 9: Incentives

The issue of incentives for IRP is not specifically mentioned in Enbridge Gas's IRP Proposal and was not mentioned in the Draft Issues List.

Environmental Defence (supported by Anwaatin, GEC, Pollution Probe, and SEC) submitted that a new issue should be added on what incentives are appropriate to

ensure optimal integrated resource planning outcomes. Enbridge Gas submitted that it did not oppose adding an issue on this topic.

## Findings

The OEB agrees it is appropriate to consider whether it is appropriate to develop incentives that can be used to encourage optimal planning. Incentives may also include the removal of a disincentive. This issue may link to the issue of cost recovery for IRP (Issue 7).

Issue 9 is now as follows:

*What incentives are appropriate to ensure effective IRP outcomes?*

## Issue 10: Monitoring and Reporting

Enbridge Gas proposes that it would file an IRP report with the OEB annually after the first IRP Plan/IRPA is approved, providing a progress report on the spending and peak demand savings achieved by any active IRPAs. Draft Issue 12 was related to the monitoring and reporting on IRPAs.

Enbridge Gas, supported by BOMA, Anwaatin, and OEB staff, proposed adjusting the wording of this issue to reflect Enbridge Gas's intention (as described in the IRP Proposal) that Enbridge Gas may seek approval to adjust investments in IRPAs previously approved by the OEB, based on the results of the annual IRP report.

Pollution Probe proposed a new issue on metrics or a scorecard to assess outcomes for IRP.

## Findings

The OEB will consider the appropriate monitoring and reporting on IRP Plans. This can include whether metrics and a scorecard should be developed. The OEB acknowledges that Enbridge Gas may seek adjustments to an IRP Plan through an application based on the results of its IRP report.

Issue 10 is now as follows:

*What is the appropriate approach for monitoring and reporting on the progress of IRP Plans, including consideration of metrics and a scorecard?*

### 3 NEXT PROCEDURAL STEPS

Given the OEB's stated intention to establish an IRP Framework for Enbridge Gas, the next stage in this proceeding will provide an opportunity for both Enbridge Gas and other parties to file evidence (in addition to Enbridge Gas's existing IRP Proposal) that will assist the OEB in addressing the issues on the Issues List and developing this IRP Framework. The OEB recognizes that this hearing may be a multi-stage process and, at this time, is not establishing additional procedural steps beyond those related to the filing of evidence.

As noted in Procedural Order No. 1, OEB staff is procuring expert evidence to review natural gas integrated resource planning in other jurisdictions such as New York State and its relevance to Ontario, and potentially other IRP-related topics as well. The OEB is requiring OEB staff to file a letter providing more details on the nature of its proposed evidence by July 29, 2020.

All other parties intending to file additional evidence will then be required to file a letter with the OEB describing the nature of their proposed evidence, which should not duplicate that of OEB staff. Parties intending to file evidence are strongly encouraged to work co-operatively.

In its request for intervenor status, ENGLP stated that it may adduce evidence with respect to one or more issues in this proceeding. The OEB may be assisted by evidence from a utility in addition to Enbridge Gas.

Enbridge Gas's IRP Proposal discusses a more detailed IRP study conducted by ICF International, which may provide additional information useful in this proceeding.<sup>2</sup> The OEB expects Enbridge Gas to file this IRP study by July 22, 2020. Enbridge Gas is encouraged to file any additional evidence that it believes to be relevant, given that the approved issues are broader than provided for in Enbridge Gas's IRP Proposal. By July 29, 2020, Enbridge Gas is to indicate whether it intends to file any additional evidence, and if so, the scope of this evidence. It is expected that Enbridge Gas will file any additional evidence by September 10, 2020 at the latest.

Cost eligible intervenors who intend to file evidence and seek recovery of costs for this should provide additional details, including whether the evidence will be commissioned

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<sup>2</sup> EB-2019-0159, Exhibit A, Tab 13, pp. 5-7, November 1, 2019.



jointly with other parties, how those customers represented by the intervenors are affected by the subject matter of the evidence, and the estimated cost for the evidence.

Regarding eligibility for cost recovery related to evidence, preference will be given to expert evidence, within the meaning of this term as it is used in the OEB's [\*Rules of Practice and Procedure\*](#). The description of the estimated cost of any expert evidence should include an explanation of any assumptions regarding the purpose and scope of the participation of the expert in the proceeding, and should include an estimate of any incremental time that will be spent by the intervenor's counsel or any other consultant(s) in relation to the expert evidence. In addition, the expert's prior experience testifying on the subject before a regulator should be included.

After reviewing the letters filed, the OEB will provide guidance on whether and to what extent any costs associated with evidence will be eligible for cost recovery.

The OEB is also setting a proposed date (October 13, 2020) for filing of intervenor evidence. If parties who plan to file evidence believe that this date cannot be met, they should indicate within their letter when they do expect that their evidence can be filed. The OEB will then establish the date by which evidence must be filed.

## 4 ORDER

### THE ONTARIO ENERGY BOARD ORDERS THAT:

1. The scope of the proceeding is specified by the Issues List approved by the OEB and attached as Schedule A to this Decision and Procedural Order No. 2.
2. Enbridge Gas Inc. shall file with the OEB ICF International's Integrated Resource Plan Study by **July 22, 2020**.
3. Enbridge Gas Inc. shall file with the OEB a letter describing the nature of additional evidence it intends to file, if any, by **July 29, 2020**.
4. OEB staff shall file a letter with the OEB describing the nature of its proposed evidence by **July 29, 2020**.
5. Parties that intend to file any evidence in this proceeding shall file a letter with the OEB describing the nature of the proposed evidence by **August 5, 2020**.
6. Enbridge Gas Inc. shall file additional evidence with the OEB, if any, by **September 10, 2020**.
7. Other parties that intend to file evidence should plan on filing their evidence with the OEB by **October 13, 2020**.

All materials filed with the OEB must quote the file number, **EB-2020-0091**, and be submitted in a searchable / unrestricted PDF format with a digital signature through the OEB's web portal at <https://pes.ontarioenergyboard.ca/eservice>. Filings must clearly state the sender's name, postal address, telephone number, fax number and e-mail address. Parties must use the document naming conventions and document submission standards outlined in the RESS Document Guidelines found at <http://www.oeb.ca/OEB/Industry>. If the web portal is not available, parties may email their documents to [boardsec@oeb.ca](mailto:boardsec@oeb.ca).

All communications should be directed to the attention of the Board Secretary at [BoardSec@oeb.ca](mailto:BoardSec@oeb.ca), and be received no later than 4:45 p.m. on the required date.

With respect to distribution lists for all electronic correspondence and materials related to this proceeding, parties must include the Case Manager, Michael Parkes at [Michael.Parkes@oeb.ca](mailto:Michael.Parkes@oeb.ca) and OEB Counsel, Michael Millar at [Michael.Millar@oeb.ca](mailto:Michael.Millar@oeb.ca).

**DATED** at Toronto July 15, 2020

**ONTARIO ENERGY BOARD**

*Original Signed By*

Christine E. Long  
Registrar and Board Secretary

**Schedule A**

**Enbridge Gas Inc.**

**EB-2020-0091**

**Issues List**

**Integrated Resource Planning Proposal**

**Dated: July 15, 2020**

## **Issues List**

### **Enbridge Gas - Integrated Resource Planning Proposal**

1. What is Integrated Resource Planning (IRP) and what should the comprehensive goals of IRP be?
2. What is the appropriate process and approach for incorporating IRP into Enbridge Gas's system planning process, including scope, timing, stakeholder consultation, approval process and evaluation?
3. What, if any, OEB approvals are required under the IRP Framework, including for IRP Plans?
4. Will the IRP Framework necessitate consequential changes to any other OEB policies, rules, or guidelines? If so, which policies, rules, or guidelines might be affected, and how should these changes be addressed?
5. What are industry best practices for IRP, and how are they applicable to the Ontario context?
6. What screening criteria and methodology should be adopted to evaluate and compare IRP Alternatives (IRPAs) with one another and with facility projects?
7. What is the appropriate approach to the recovery of the costs resulting from an approved IRP Plan and the costs for additional investments to support IRP?
8. Who should bear the risk of an IRP Plan that does not accomplish its planned expectations and should there be consequences for not achieving planned expectations?
9. What incentives are appropriate to ensure effective IRP outcomes?
10. What is the appropriate approach for monitoring and reporting on the progress of IRP Plans, including consideration of metrics and a scorecard?

**Schedule B**

**Enbridge Gas Inc.**

**EB-2020-0091**

**Updated Applicant and List of Intervenors**

**Integrated Resource Planning Proposal**

**Dated: July 15, 2020**

**Enbridge Gas Inc. - Integrated Resource Planning Proposal  
EB-2020-0091**

**UPDATED APPLICANT & LIST OF INTERVENORS**

July 15, 2020

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**APPLICANT**

**Rep. and Address for Service**

**Enbridge Gas Inc.**

**Stephanie Allman**

Regulatory Coordinator  
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