



Adam Stiers  
Technical Manager  
Regulatory Applications  
Regulatory Affairs

Tel: (519) 436-4558  
Email: [astiers@uniongas.com](mailto:astiers@uniongas.com)  
[EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com)

Enbridge Gas Inc.  
P.O. Box 2001  
50 Keil Drive N.  
Chatham, Ontario, N7M 5M1  
Canada

July 29, 2020

BY RESS and EMAIL

Ms. Christine Long  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0091 – Enbridge Gas Inc. – Integrated Resource Planning Proposal  
Additional Evidence**

---

In accordance with the Ontario Energy Board's ("OEB" or "Board") Decision on Issues List and Procedural Order No. 2 ("PO No. 2"), dated July 15, 2020, below is a description of additional evidence Enbridge Gas intends to file to assist the OEB in addressing the issues on the Issues List set out in Schedule A of PO No. 2 and in developing its Integrated Resource Planning ("IRP") Framework for Enbridge Gas.

### **Additional Evidence Outline**

Enbridge Gas proposes to put forth additional evidence that builds upon its original IRP Proposal<sup>1</sup> and ICF Canada's ("ICF") Final Report on Natural Gas Integrated Resource Planning: Initial Assessment of the Potential to Employ Targeted DSM to Influence Future Natural Gas Infrastructure Investment (the "IRP Study"), dated May 18, 2018.<sup>2</sup> This additional evidence is responsive to the expanded scope of this proceeding, as set out by the OEB in PO No. 2 (to consider IRP for Enbridge Gas on a broader basis than the specific IRP Proposal filed).<sup>3</sup>

This additional evidence will seek to provide: (i) a summary of historical OEB directives, findings and recommendations regarding IRP and Enbridge Gas's ongoing actions to comply with the same, in support of Issue 2;<sup>4</sup> (ii) an updated jurisdictional review by ICF of advancements and treatment of natural gas IRP in certain other jurisdictions since the completion of the IRP Study, in support of Issues 1 and 5; and (iii) an IRP Process Plan that details how IRP would preferably be integrated into system planning activities at Enbridge Gas going forward (for illustrative purposes), in support of Issues 2, 6 and

---

<sup>1</sup> EB-2019-0159, Exhibit A, Tab 13.

<sup>2</sup> EB-2020-0091, IRP Study, July 22, 2020.

<sup>3</sup> PO No. 2, p. 5.

<sup>4</sup> Enbridge Gas was formed by the amalgamation of Enbridge Gas Distribution Inc. ("EGD") and Union Gas Limited ("Union"), on January 1, 2019 pursuant to the *Ontario Business Corporations Act*, R.S.O. 1990, c. B. 16. Enbridge Gas carries on the business of selling, distributing, transmitting and storing natural gas in Ontario within the meaning of the *Ontario Energy Board Act*, 1998 (the "Act").

10. Enbridge Gas believes that this additional evidence will be of assistance to the OEB and parties in this proceeding in addressing and determining an appropriate IRP Framework for Enbridge Gas.

A description of each section of Enbridge Gas's proposed additional evidence follows:

**(i) *Chronology of OEB Directives, Findings and Recommendations Regarding IRP***

Board Staff's Draft Issues List set out in Schedule A of Procedural Order No. 1 ("PO No. 1"), dated May 21, 2020, and the submissions of certain intervenors on the draft Issues List suggest that parties to the proceeding would benefit from a general understanding of previous OEB direction and guidance on IRP.<sup>5</sup> Enbridge Gas will prepare an annotated chronology of such directives/guidance that can assist the Board and parties in this regard.

**(ii) *Jurisdictional Review of IRP Advances (Since May 2018)***

In 2018, as part of ICF's IRP Study, ICF completed a jurisdictional review and consultation to determine what progress has been made on natural gas IRP by other North American utilities. The majority of the research for this jurisdictional scan was completed in 2017. At that time, ICF concluded that few natural gas utilities outside of Ontario had begun to consider the impact of DSM programs on peak hour or peak day demand forecasts used for facilities/system planning.

Since this time, natural gas utilities have continued to carry-out IRP studies and to pursue IRP-related projects and pilots that are relevant to the OEB's work to address the issues set out in its Issues List and in developing its IRP Framework for Enbridge Gas. Jurisdictions where IRP studies and projects have proceeded in recent years include New York, British Columbia, and Oregon.

Enbridge Gas has now retained ICF to complete an updated jurisdictional scan of IRP to report on more recent developments in the use of IRP alternatives ("IRPAs") to defer or avoid the need for investment in incremental natural gas facilities. ICF's work is now underway but has not yet been completed.

**(iii) *Illustrative IRP Process Plan***

In the interest of advancing the Board's consideration of IRP and the establishment of an IRP Framework, Enbridge Gas has commenced work on an IRP Process Plan that can be used for illustrative purposes as part of this proceeding. Enbridge Gas acknowledges that there is uncertainty regarding the OEB's definition and intended application of IRP,<sup>6</sup> but believes that it is useful to provide more detail and clarity

---

<sup>5</sup> Summarized in the discussion about Issue 2 in PO No. 2 (pages 8-9).

<sup>6</sup> There are also policy and information gaps around deployment of IRP, as identified by ICF in the IRP Study.

around how IRP can work for Enbridge Gas. This can assist the OEB in understanding and evaluating an appropriate IRP Framework for Enbridge Gas.

The Illustrative IRP Process Plan that Enbridge Gas is preparing for filing will include:

- A proposal for incorporating IRP into Enbridge Gas's system planning processes (e.g. the Asset Management Plan);
- General guidelines for stakeholder engagement/consultation following the identification of a need for incremental capacity; and
- A proposal regarding the types of approvals and applications Enbridge Gas will seek from the Board to pursue investment into IRPAs.

### **Timing**

In order to complete the additional evidence described above, Enbridge Gas requests that the OEB grant an extension of the deadline for submission of additional evidence from September 10, 2020 to October 15, 2020. The Company needs this additional time in order to properly complete the proposed additional evidence. In ordinary circumstances, it would be very difficult to complete the proposed additional evidence within six weeks. Current extraordinary circumstances caused by the COVID-19 pandemic add to this challenge – examples include remote working, mandatory organization-wide vacations in the summertime and executive focus on other priorities.

If the OEB grants Enbridge Gas the extension sought, then Enbridge Gas would also support a commensurate extension of the deadline for submission of evidence from OEB Staff and approved intervenors (from October 13, 2020) by a similar duration.

Alternatively, to ensure a fair and equitable process, the OEB could adjust the procedural timeline set out in PO No. 2 to align the deadline for additional evidence from all parties, Enbridge Gas, OEB Staff and intervenors, to October 15, 2020. This would ensure that no party to the proceeding is afforded additional opportunity to respond to the submissions or evidence of others and is consistent with the earlier procedural deadlines established by the Board in Procedural Order No. 1 ("PO No. 1"), dated May 21, 2020, which established common deadlines for Enbridge Gas, OEB Staff and approved intervenors.

Finally, as the applicant, Enbridge Gas also requests that the OEB afford Enbridge Gas opportunity to file responding evidence (if appropriate) following the evidence filed by OEB Staff and intervenors. Enbridge Gas believes that this will be particularly necessary and appropriate where the evidence from other parties (including OEB Staff) takes the form of expert evidence. In that event, Enbridge Gas may find it necessary to engage its own expert(s) to assess and respond. Enbridge Gas expects to be in a better position to comment on this potential requirement after OEB Staff and other parties have filed their own letters summarizing their proposed evidence.

If you have any questions, please contact the undersigned.

Sincerely,

[original digitally signed by]

---

Adam Stiers  
Technical Manager, Regulatory Applications

c.c.: David Stevens (Aird & Berlis)  
Michael Parkes (OEB Staff)  
Michael Millar (OEB Counsel)  
EB-2020-0091 (Intervenors)