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BY EMAIL

July 29, 2020

Ms. Christine E. Long
Registrar & Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
BoardSec@oeb.ca

Dear Ms. Long:

**Re: Ontario Energy Board (OEB) Staff Description of Expert Evidence
Enbridge Gas Inc. – Integrated Resource Planning Proposal
OEB File Number: EB-2020-0091**

In accordance with Procedural Order No. 2, please find attached a description of the expert evidence that OEB staff intends to have produced and filed in this proceeding. Guidehouse Canada Ltd. has been selected as the Vendor for this project. The attached document has been forwarded to Enbridge Gas Inc. and to all other parties to this proceeding.

Yours truly,

Original Signed By

Michael Parkes
Project Advisor, Application Policy & Conservation

Encl.

Description of Natural Gas Integrated Resource Planning Research Report

Purpose and Scope of IRP Report

The purpose of the Natural Gas Integrated Resource Planning (IRP) Research Report (IRP Report) is to contribute to the OEB's review of IRP for Enbridge Gas in the regulatory proceeding EB-2020-0091, by generating expert analysis of natural gas IRP in New York State and assessing its relevance to natural gas IRP in Ontario.

The IRP Report will focus on the IRP experience of natural gas utilities in New York State, in particular, Consolidated Edison Inc. (Consolidated Edison Company of New York Inc. (CECONY); Orange and Rockland Utilities, Inc.; jointly referred to hereafter as "Con Edison") and National Grid (National Grid US, including KeySpan Energy Delivery New York (KEDNY), KeySpan Energy Delivery Long Island (KEDLI), and Niagara Mohawk operating areas; referred to hereafter as "National Grid"). The focus will be on the CECONY and KEDNY/KEDLI operating areas, which have the most experience with these topics. The consideration, planning, and implementation of alternatives to natural gas infrastructure is more advanced in New York State than other North American jurisdictions, and an analysis of IRP in New York State is likely to provide insights as to the potential role and regulatory treatment of IRP in Ontario's natural gas sector.

The IRP Report will provide expert analysis of natural gas IRP in New York State, in comparison with each of the IRP issues in the issues list for the EB-2020-0091 proceeding (Issues List) and Enbridge Gas's IRP proposal (Enbridge IRP Proposal) in that proceeding, and provide recommendations for natural gas IRP in Ontario based on the jurisdictional analysis.

Research Methodology

The IRP Report will be primarily based on documents in the public record as well as the knowledge and expertise of the Vendor's project team, including previous experience working with Con Edison and other New York State utilities. This analysis will be supplemented, if possible, by interviews with program managers at Con Edison and National Grid (one interview for Con Edison and one for National Grid) to confirm key details of their program, capture lessons learned, and understand future improvements. If possible, the Vendor will also conduct an interview with regulatory officials at the New York State Public Service Commission involved in IRP for Con Edison and National Grid.

Draft Table of Contents for IRP Report

1. **Executive Summary:** This section will contain a summary of the objectives of the work, a description of the work conducted, key findings and recommendations.
2. **Introduction:** This section will contain a description of the context for the work conducted, objectives and scope of work, and a description of the approach and methodology for the work conducted.
3. **Integrated Resource Planning in New York State Overview:** This section will provide a brief summary of the definition, scope, goals, methodology, benefits, timing, stakeholder consultation, approval process and evaluation of natural gas IRP processes in New York State. This section will also highlight the range of IRP activities being considered and implemented in New York

State.

4. **Detailed Description of Con Edison’s Smart Solutions Program and Similar Programs in New York State:** This section will provide a detailed description of Con Edison’s Smart Solutions Program and other relevant gas demand response and non-pipes solutions programs in New York State (Programs). This characterization will include analysis of the original petition, subsequent regulatory developments, and experience to date implementing the proposed solutions in these Programs. This section will contain more focus and detail on aspects of the Programs where there have been significant learnings or challenges in the work performed to date by Con Edison and other New York State utilities.
5. **Comparison of How IRP Elements are Addressed in Con Edison’s Smart Solutions Program and Similar Programs in New York State, and in the Enbridge IRP Proposal:** This section will contain a point-by-point description of each IRP issue in the Issues List, and a comparative analysis highlighting how and the degree to which each element in the Issues List has been addressed in the Enbridge IRP Proposal (as filed with the OEB at the start of the Vendor’s work) and in the development and regulatory review of Con Edison’s Smart Solutions Program and similar programs in New York State. This section will also identify if there are any key elements of Con Edison’s Smart Solutions Program or similar programs in New York State that are not addressed in the Issues List, and/or do not have a parallel in the Enbridge IRP proposal.
6. **Differences between Enbridge Gas and Con Edison/National Grid Service Territories:** This section will address differences between the Enbridge Gas and Con Edison/National Grid service territories that may be relevant to IRP implementation (e.g. overall policy/regulatory context, natural gas supply/demand balance, differences in customer bases, etc.) and that should be taken into consideration in a comparative analysis. This will include differences in the role and approval process for OEB and New York State regulators.
7. **Industry Best Practices for Natural Gas IRP Identified From New York State:** This section will summarize the key characteristics and best practices from the natural gas IRP programs analyzed in this project, and if interviews are conducted, lessons learned and planned improvements identified by Con Edison and National Grid program managers regarding their own IRP experiences. This may include identification of areas for potential change to OEB policies, rules and guidelines based on best practices identified and the analysis the Vendor has conducted. The Vendor will rely on the OEB’s detailed understanding of current policies, rules, and guidelines when identifying gaps and areas for potential change.
8. **Recommendations:** This section will provide a summary of the analysis of Con Edison’s and National Grid’s experience in New York, the Vendor’s findings and the Vendor’s recommendations to the OEB regarding the review of the Enbridge IRP Proposal and development of an IRP framework for Enbridge Gas.