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August 6, 2020

VIA RESS

Ms. Christine E Long
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Long:

**Re: EPCOR Natural Gas Limited Partnership (ENGLP)
2020 Gas Supply Review
Board File No.: EB-2020-0106**

We are counsel to Anwaatin Inc. (**Anwaatin**). Please find enclosed Anwaatin's written questions to ENGLP in the above-noted proceeding, filed pursuant to the notice dated July 6, 2020.

Sincerely,

A handwritten signature in black ink that reads "Jonathan McGillivray". The signature is fluid and cursive, with the first name being the most prominent.

Jonathan McGillivray

c. Kenneth Poon, EPCOR Ontario Utilities Inc.
Larry Sault, Anwaatin Inc.
Don Richardson

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Sched. B, as amended (the **Act**);

AND IN THE MATTER OF the consultation to review the annual updates to the five-year natural gas supply plans of EPCOR Natural Gas Limited Partnership (**ENGLP**).

EB-2020-0106

WRITTEN QUESTIONS FROM

ANWAATIN INC.

August 6, 2020

Question: Anwaatin.1

- Reference:
- Aylmer Gas Supply Plan 2020-2025 (**Aylmer Plan**), p. 25
 - Southern Bruce Gas Supply Plan 2020-2023 (**Bruce Plan**), p. 25

Preamble: The majority of First Nations in Ontario do not have access to natural gas, and many First Nations are interested in accessing natural gas for energy cost savings and low-emission heating. The *Access to Natural Gas Act, 2018*, SO 2018, c 15 (**ACGA**) provides a framework for regulations to deliver rate protection for consumers or prescribed classes of consumers with respect to costs incurred by natural gas distributors in making a qualifying investment for the purpose of providing access to a natural gas distribution system to those consumers by reducing the rates that would otherwise apply in accordance with the prescribed rules.

- a) For both the Aylmer Plan and the Bruce Plan, please describe in greater detail the impacts ENGLP expects the ACGA will have and its adherence to the principles of cost effectiveness, reliability, and achieving public policy objectives.
- b) For both the Aylmer Plan and the Bruce Plan, indicate how the respective plan will ensure that it supports and is aligned with the public policy objectives of the ACGA and, in particular, the expansion of natural gas access to First Nation reserve communities and off-reserve First Nation members?
- c) For both the Aylmer Plan and the Bruce Plan, please indicate what impacts, if any, the respective plans will have on the cost of natural gas to First Nation reserve communities and off-reserve First Nation members?
- d) For both the Aylmer Plan and the Bruce Plan, what impacts, if any, will the respective plans have on the expansion of natural gas distribution services to First Nation reserve communities and off-reserve First Nation members? Please provide specific expansion strategy and geographic plans.
- e) Does ENGLP have plans to introduce low-income rate assistance for First Nation reserve communities and off-reserve First Nation members into either the Aylmer Plan or Bruce Plan and business activities broadly? If so, please provide details. If not, please explain why not.

Question: **Anwaatin.2**

Reference: • Aylmer Plan, pp. 24-25

Preamble: “ENGLP understands and supports the development of an RNG market and facilitates inclusion of RNG in its gas supply portfolio. ENGLP recognizes the importance of Greenhouse Gas (GHG) abatement across the province, as well as the role that ENGLP plays in supporting the achievement of GHG emission reduction targets.

At this time, ENGLP does not hold any RNG supply in its Supply Plan. However, ENGLP has had initial discussions with customers capable of providing RNG into the natural gas distribution system. ENGLP will update the Supply Plan as strategies of a RNG solution are developed and finalized.”

- a) What are ENGLP’s plans for introducing RNG supply into its gas supply plans? Please address the anticipated timelines, quantities, suppliers, locations, and impacts of RNG supply in relation to gas supply planning.

- b) Does ENGLP have any plans to introduce hydrogen supply into its Aylmer or Bruce Plans? Please address the anticipated timelines, quantities, suppliers, locations, and impacts of hydrogen blending and/or injection.

Question: Anwaatin.3

- Reference:
- Aylmer Plan, p. 5
 - Bruce Plan, p. 5

Preamble: The Plans may inform or underpin strategic, higher level decisions in relation to natural gas supply, storage, and transportation.

In its [Decision and Order on Enbridge Gas Distribution Inc.'s application for the RNG Enabling Program in EB-2017-0319 dated October 18, 2018](#), the Ontario Energy Board confirmed that “strategic, higher level decisions can trigger the duty to consult” First Nation and Métis communities (p. 25)

- a) Please identify any and all outstanding or continuing Aboriginal or Treaty rights and/or traditional territories that apply to each and all of ENGLP’s pipeline infrastructure and natural gas supply and storage areas.

- b) For both the Aylmer Plan and the Bruce Plan, please describe and provide evidence for whether — and, if so, how — ENGLP determined, interpreted, and applied:
 - (i) its procedural requirements;
 - (ii) the Crown’s procedural requirements; and
 - (iii) the Ontario Energy Board’s procedural requirements;

in assisting the Crown in fulfilling its duty to consult and accommodate the First Nation and Métis communities in relation to both the Aylmer Plan and Bruce Plan.

Question: **Anwaatin.4**

Reference • Aylmer Plan, pp. 30-32
 • Southern Bruce Plan, pp. 33-34

Preamble: Liquefied natural gas (**LNG**) services and distribution facilities are beginning to play a role in natural gas distribution in Ontario.

- a) What are ENGLP's plans for introducing LNG supply into both the Aylmer Plan and the Bruce Plan?
- b) What role does LNG play in natural gas expansion programs related to the ACGA, or otherwise?

Question: Anwaatin.5

Preamble: Across Southern Ontario, ENGLP natural gas infrastructure traverses First Nation treaty lands, as well as reserve lands. Municipal Franchise Agreements may serve as a mechanism for easement agreements between municipal governments and utilities.

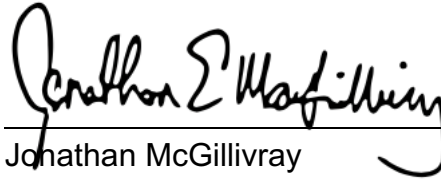
- a) For both the Aylmer Plan and the Bruce Plan, what agreements, if any, does ENGLP envision between First Nation governments and the company to support the respective plans, while ensuring that First Nation easement and rights-of-way petitions do not delay service expansions, or cause increased costs to ratepayers?

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS

6th day of August, 2020.



Lisa (Elisabeth) DeMarco
DeMarco Allan LLP
Counsel for Anwaatin



Jonathan McGillivray
DeMarco Allan LLP
Counsel for Anwaatin