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BY RESS and EMAIL

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

Dear Ms. Long:

**Re: Enbridge Gas Inc. ("Enbridge Gas")
Ontario Energy Board File No.: EB-2020-0091
Integrated Resource Planning Proposal ("Application")
Details of Additional Evidence**

In accordance with the Ontario Energy Board's ("OEB" or "Board") Procedural Order No. 4, dated August 20, 2020 ("PO No. 4"), Enbridge Gas Inc. ("Enbridge Gas", or the "Company") is filing this letter describing the extent to which its additional evidence will address its approach to long-term supply-side alternatives as part of Integrated Resource Planning ("IRP").¹ Enbridge Gas also wishes to reiterate its concerns regarding the relevance of evidence proposed by the Federation of Rental-housing Providers of Ontario ("FRPO").

Enbridge Gas Additional Evidence –

In its letter of July 29, 2020, describing the additional evidence it intends to file to assist the OEB in addressing the issues on the Issues List,² Enbridge Gas proposed to file an IRP process plan that describes how IRP would preferably be integrated into system planning processes at Enbridge Gas in the future. As part of that IRP process plan Enbridge Gas intends to describe how and when: (i) system capacity constraints are identified; and (ii) facility and non-facility alternatives (including IRP alternatives ("IRPAs")) that could address such constraints will be assessed. As Enbridge Gas considers long-term supply-side alternatives to be IRPAs it intends to assess them together with all other facility and non-facility alternatives following the identification of system capacity constraints. To further assist the Board, Enbridge Gas's additional evidence will also include an illustrative and non-exhaustive list of facility and non-facility alternatives that may be included as part of such assessments and in any subsequent applications to the OEB for approval to implement and/or recover the costs

¹ As the need for investment in facility and non-facility alternatives is ultimately driven by long-term firm peak demand growth causing long-term system capacity constraints, it is important that the OEB focus its assessment of IRP alternatives upon long-term facility and non-facility alternatives (including long-term supply-side alternatives).

² EB-2020-0091, OEB Decision on Issues List and Procedural Order No. 2 ("PO No. 2"), July 15, 2020, Schedule A.

associated with investment in IRPAs or for leave-to-construct facilities.³

Proceeding in this manner will: (i) satisfy the OEB's intent to "explore the appropriate timing and approach to considering these long-term supply-side alternatives as part of the IRP framework";⁴ and (ii) ensure that future applications to implement or recover the costs associated with any specific IRPA or facility leave-to-construct are filed with the OEB far enough in advance to provide the Board and parties with sufficient time to consider all viable facility and non-facility alternatives.

FRPO Proposed Evidence –

In its June 4 and June 11, 2020 submissions on the Draft Issues List, Enbridge Gas argued against approval of issues that would establish an excessively broad scope for the proceeding that conflates Enbridge Gas's IRP Proposal with matters more appropriately dealt with through other proceedings:

"Though aspects of these matters necessarily relate to its IRP Proposal and will contribute to the OEB's review of the same, this proceeding should not be used as a means of re-hearing matters previously decided by the Board or to address matters that are actively before the Board in other proceedings."⁵

In PO No. 2, the OEB subsequently found:

"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."⁶

"The OEB expects that the IRP Framework to be determined will not reference specific facilities/IRPAs..."⁷

Enbridge Gas's IRP Proposal does not seek OEB approval to implement specific IRPAs or to recover the costs associated with investment in specific IRPAs and Enbridge Gas does not intend to seek any such IRPA-specific approval from the Board as part of this proceeding. Instead, Enbridge Gas believes that consideration and approval of specific IRPAs (including long-term supply-side solutions) is appropriately dealt with in future IRPA or leave to construct applications considering responses to specific identified needs.

Accordingly, in its August 12, 2020 letter responding to the evidence proposed by FRPO, Enbridge Gas submitted that,⁸

"Natural gas market fundamentals in Ontario are by their nature dynamic and impacted by broader evolving Canadian, North American and Global economic variables. In other words, a snapshot of information and data on the natural gas market and flow dynamics in Ontario as of November 2020, as proposed by FRPO, would not provide the Board with information that is relevant to the development of an IRP framework for Enbridge Gas or that is generally applicable to future IRPA or leave-to-construct ("LTC") applications. Instead, such market fundamentals are more appropriately considered at such time that

³ It is not feasible to include an exhaustive list of all facility and non-facility alternatives (including long-term supply-side alternatives) as part of this proceeding as such alternatives are specific to and entirely dependent upon the location, magnitude and nature of system capacity constraints identified and market conditions at a specific point in time.

⁴ Consistent with the OEB's interests set out on page 5 of PO No. 4.

⁵ EB-2020-0091, Enbridge Gas Submission on Draft Issues List, June 4, 2020, p. 1.

⁶ PO No. 2, p. 6.

⁷ PO No. 2, p. 12.

⁸ EB-2020-0091, Enbridge Gas Letter – Intention to File Responding Evidence, August 12, 2020, p. 3.

Enbridge Gas identifies a need for incremental system capacity and seeks approval to implement and/or recover the costs associated with avoiding, deferring or meeting that need.”⁹

In PO No. 4, the OEB expressed similar concerns with FRPO’s proposed evidence:¹⁰

“It is not clear whether FRPO’s proposed evidence will be relevant to the issues described in the Issues List for this IRP proceeding, and will not duplicate matters considered in the OEB’s recent review of Enbridge Gas’ five-year natural gas supply plan (EB-2019-0137). The OEB also agrees with comments from Enbridge Gas that natural gas market fundamentals in Ontario are dynamic, and that a snapshot of information and data on the natural gas market and flow dynamics in Ontario at a particular point in time may be more relevant in the context of future applications to address specific system needs than in the development of an IRP framework.”

For the reasons set out above, Enbridge Gas again submits that the Board should deny FRPO’s proposed evidence dealing with natural gas market and flow dynamics on the basis that it is not immediately relevant to the review of Enbridge Gas’s application or the development of an IRP policy framework for Enbridge Gas. If FRPO is permitted to file evidence, Enbridge Gas submits that the Board should direct that FRPO’s evidence avoid consideration of specific facilities/IRPAs (including specific supply-side alternatives) and the duplication of matters previously considered in the review of Enbridge Gas’s five-year natural gas supply plan (EB-2019-0137) which concluded less than six months ago.

If you have any questions, please contact the undersigned.

Sincerely,

Adam Stiers
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cc: D. Stevens (Aird & Berlis)
M. Parkes (OEB Staff)
M. Millar (OEB Counsel)
EB-2020-0091 Intervenors

⁹ EB-2020-0091, Enbridge Gas Letter – Intention to File Responding Evidence, August 12, 2020, p. 3.

¹⁰ PO No. 4, p. 4.