

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

November 9, 2020

**Re: EB-2020-0091 Enbridge Gas Integrated Resource Planning Proposal
Pollution Probe Letter of Comment**

Dear Ms. Long:

The OEB has set the foundation for an open and productive generic IRP process and invited participation from stakeholders throughout the IRP proceeding in an attempt to achieve the best long-term outcomes for Ontario. Pollution Probe provides the following letter of comment to sharing information and observations that will hopefully assist the OEB in ensuring that the IRP proceeding sets a successful foundation for decades to come.

It is clear that the old ways of planning and executing to meet Ontario's energy needs will not be suitable for the future. Energy consumers, municipalities, policy makers and the vast majority of stakeholders don't operate in terms of comparing natural gas solutions to natural gas solutions. This was in part what led to a much broader Issue List for this generic IRP proceeding vs. a very narrow definition originally proposed by Enbridge in its IRP Proposal. Pollution Probe and the energy consumers, municipalities and other stakeholders we represent in this proceeding strongly support the broad-based approach the OEB defined in Procedural Order No.2. This approach is appropriate to ensure that the outcomes of this IRP proceeding achieve the intended goal and that they are sustainable for the long term.

It has become clear through recent correspondence (including that of FRPO, GEC and Enbridge) that there is conflict over the best way to ensure that best available information is put on the record to inform the process and achieve a successful outcome. A generic proceeding typically provides an open process where all interested stakeholder (including Enbridge) are treated fairly and equally. This kind of open process is the only way to provide the best outcome for Ontario and its energy consumers.

Pollution Probe was hopeful that the stakeholders that committed the extra effort to commission evidence for this proceeding would enable all the best available information to be put on the record in support of an open and transparent discussion to enable successful outcomes for Ontario. At this point in the proceeding, we are not as hopeful and are worried that there may be significant gaps in the evidence and information that the OEB will need to make an informed decision based on best available information.

There are potential gaps emerging that could jeopardise the ability for the OEB to make decisions on best available information. Enbridge's supplemental evidence filed October 15, 2020 did not address many IRP-related issues and opportunities relevant to Ontario and this proceeding. Enbridge's

supplemental evidence also appears to suggest that this proceeding is not generic in nature and that Enbridge as the proponent should control the scope based on its IRP Proposal scope. Enbridge also appears to be trying to narrow the scope of the IRP proceeding when it indicates “Addressing peak demand in a very targeted manner is the contemporary understanding of IRP” [2020-0091 Exhibit B, Page 4]. This is entirely incorrect and puzzling given that Procedural Order No.2 made it clear that the scope of the proceeding is broader in nature and goes far beyond what Enbridge had requested in its initial application (EB-2019-0159 coupled with the Dawn-Parkway project that has now been requested for withdrawal by Enbridge). In fact, the OEB has indicated that “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.” [EB-2020-0091 Procedural Order No. 2].

Effective IRP is not utility-centric, rather effective IRP is an open and consultative planning and approval framework where the local utility is one of many stakeholders that need to plan for and respond to the broader energy market and consumer dynamic. Given the convergence of consumer energy choices and the growing need for clean energy (consistent with the recent OEB decisions for RNG and hydrogen pilots), effective IRP requires looking at issues from a fuel-agnostic Ontario-wide lens and not just a natural gas utility lens. The OEB reiterated in Procedural Order No. 5 “its previous determination from Procedural Order No. 4 that the consideration of supply-side alternatives is pertinent to IRP, and therefore is in scope of this proceeding”. Non-gas options may displace natural gas in some circumstances and that context is critical as the OEB considers an IRP Framework that will meet Ontario’s future needs. IRP needs to compliment the broader move to community energy planning across Ontario. A simple illustration is the City of Ottawa Energy Evolution Plan [<https://app05.ottawa.ca/sirepub/cache/2/ywlg2uoff5fsirs030l2ain/66270911062020090814838.PDF>] which was unanimously approved by Council and indicates that all fossil fuels will have to be phased out by 2050. This is similar to many municipalities across Ontario and could impact all infrastructure approved by the OEB.

This Generic Proceeding is similar in importance to EBO 188 and EBO 169 and has the potential to bring value to Ontario energy consumers for decades to come as the OEB delivers on its modernization mandate. Energy is interactive and not siloed like it was decades ago. This has been recognized in the OEB’s DER proceedings. Municipal energy and emissions plans, policy and consumer choices are fuel agnostic and that trend continues to accelerate with policy mandates for electrification, distributed energy resources, renewable energy (including RNG) and many other emerging energy options (e.g. hydrogen). The generic proceeding approach is an open process that treats all consumers, communities and other stakeholders equally and fairly to ensure that best available information is leveraged to achieve the best outcomes for Ontario. If Enbridge’s assertion is correct that it should receive preferential treatment in this proceeding, it means that all other stakeholders are secondary, including Ontario consumers and communities. In Pollution Probe’s view, it is not appropriate to provide any party preferential treatment in this proceeding if the OEB is interested in an objective and unbiased outcome. All parties should be treated fairly and equally.

Enbridge’s recent evidence reads more like argument than best practice evidence and one area indicates that “Enbridge Gas’s objection [to FRPO] was supported by the fact that its [Enbridge’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 IRP-specific approval from the Board as part of this proceeding” [Reference: EB-2020-0091 Exhibit B, Page 10 of 46]. Through what was intended to be evidence, Enbridge appears to be trying to shift the scope of the proceeding back to their initial IRP Proposal.

The recent supplemental evidence filed by Enbridge does little to cover the true nature of IRP and is in line with the narrow scope that Enbridge initially requested in EB-2019-0159. Pollution Probe is hopeful that the evidence filed by OEB Staff and GEC will fill that void, but there may be an evidence gap that needs to be filled to truly considering IRP best practices relevant to Ontario. One option that the OEB has proposed to mitigate this risk is for stakeholders to include reference material during the interrogatory phase. This alone may not be sufficient and Pollution Probe requests that the OEB consider additional options as it considered next steps in this proceeding.

It is important to get IRP right as the OEB delivers on its goals of modernization to meet current and future energy needs in Ontario. Pollution Probe encourages the OEB to provide the procedural flexibility and take the time needed to ensure that the outcomes from this important proceeding provide lasting benefits. One option that would bring value is the ability to consider significant gaps following the interrogatory process on the evidence that has been filed and solicit ideas to fill those gaps. It may add a step to the process, but it could be well worth it in the long run. Pollution Probe also recommends that sufficient time be considered to enable testing of evidence on the record through an oral component, similar to other generic hearing processes. Pollution Probe is already coordinating with a broad number of consumers, municipalities and stakeholders and would be happy to coordinate presentations or materials from municipalities or other partners should the OEB consider that useful. Thank you for the opportunity to share these comments and we look forward to fully participating throughout this very important proceeding.

Respectfully submitted on behalf of Pollution Probe.



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