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January 11, 2021

Ms. Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, Ontario, M4P 1E4

Dear Ms. Long,

**RE: EB-2020-0091 - London Property Management Association Interrogatories for
Enbridge Gas Inc. Application – Integrated Resource Planning Proposal**

Please find attached the interrogatories of the London Property Management Association for Enbridge Gas Inc. in the above noted proceeding.

Yours very truly,

Randy Aiken
Aiken & Associates

c.c. EGI Regulatory Proceedings (e-mail only)

Enbridge Gas Inc.

Integrated Resource Planning Proposal

**INTERROGATORIES OF THE
LONDON PROPERTY MANAGEMENT ASSOCIATION
TO ENBRIDGE GAS INC.**

Interrogatory #1

Ref: Exhibit B, page 1

- a) Does the reference to the forecasted needs of Enbridge Gas customers include both current and potential future customers, or only current customers?
- b) Does the reference to customers through the remainder of the evidence include both current and potential future customers, or only current customers?

Interrogatory #2

Ref: Exhibit B, page 13

At point iii Public Policy, EGI states that IRP will be considered in a manner to ensure that it is supportive of and aligned with public policy, where appropriate.

- a) Does public policy include those of federal, provincial and municipal governments? If not please explain which government public policies may not be considered and why.
- b) What does EGI mean by “where appropriate”? Please provide examples of where the alignment with public policy may not be appropriate.

Interrogatory #3

Ref: Exhibit B, page 20

- a) With respect to timing, on average, how long in advance is a system need identified?
- b) Over the last three years, how many system needs have been identified that must be met in under three years and how many system needs have been identified that can be met in over three years?

Interrogatory #4

Ref: Exhibit B, page 20

With respect to project-specific considerations, how would EGI determine the sizing of any relocation of natural gas infrastructure in a particular corridor if a project was being advanced for road works or water main replacements as an example? How would EGI take into account potential IRPA solutions that may impact the size of a line being moved over the life of the line?

Interrogatory #5

Ref: Exhibit B, page 20

With respect to customer-specific builds, would EGI provide an IRP analysis to the customer in order to minimize the facilities required to serve that customer, such as customer owned compressed storage or facilities to connect CNG trailers in order to reduce peak demand, saving the customers firm demand charges and resulting in smaller facilities? Please explain fully.

Interrogatory #6

Ref: Exhibit B, page 20

With respect to community expansion & economic development, please explain why an IRP analysis that could include such things as targeted DSM, CNG or LNG, the promotion of non-natural gas alternatives such as propane or hydrogen injection, air source heat pumps, geothermal heating/cooling, solar water heating, etc., should not be undertaken as part of an IRP analysis in order to minimize the sizing of the distribution pipe and any upstream high pressure distribution/transmission required to service the expansion.

Interrogatory #7

Ref: Exhibit B, page 20

Please explain how EGI's proposed IRPA would take into account proposals that may impact more than one project. For example, consider a third-party provider of compressed natural gas that can be shipped to multiple locations (expansion projects, customer-specific builds, etc.) across the province and used to provide peak day/hour capacity resulting in smaller facility requirements. How would the proposed IRPA estimate the costs in such a circumstance?

Interrogatory #8

Ref: Exhibit B, page 21

a) Does EGI currently have any customers that provide CNG to Ontario customers? Has EGI ever had any such customers? If yes, provide details while maintaining confidentiality.

b) Would the local production of natural gas be included within an IRP if the local production could be counted on to provide a firm amount of gas each day? Please explain fully.

c) Would pipe farms be included within an IRP if they were of sufficient size to deliver meaningful peak day/hour volumes? Please explain fully.

d) Would propane injection into the natural gas distribution system to meet system peaks be included as an IRP? If not, please explain why not.

Interrogatory #9

Ref: Exhibit B, page 21

Does EGI consider rate design, including new rate classes, as a potential IRPA? If not, please explain why not?

Interrogatory #10

Ref: Exhibit B, pages 21 – 22

What is the expected cost of a NGASHP relative to a conventional air source heat pump and a conventional geothermal system?

Interrogatory #11

Ref: Exhibit B, page 23, para. 45

a) Could an unregulated third party offer the alternatives noted in paragraph 44? If not, why not?

b) Please describe the associated assets that EGI would include in rate base should the OEB grant authorization to do so.

c) Would the assets noted above be customer specific or would the assets provide service to more than one customer? Please explain fully.

d) Would EGI consider an IRPA that encourages third party provides of geothermal heat pump systems and electric air source heat pumps to target specific geographical areas in order to reduce or delay the expansion of regulated natural gas assets? If not, why not?

Interrogatory #12

Ref: Exhibit B, page 21

- a) What is the current status/availability of natural gas fired air conditioning for each of the residential and commercial/industrial sectors?
- b) Could the use of natural gas fired air conditioning be used to reduce peak electricity demand while at the same time increasing the load factor of the gas distribution system without increasing the peak demand on the system?
- c) What is the current status/availability of natural gas fired generators for each of the residential and commercial/industrial sectors beyond their ability to provide backup generation in the event of a disruption in the electrical grid?
- d) Would there be any impact on the peak day/hour demand of a residential or small commercial customer using a natural gas fired generator to power electrical heating utilizing an air-source heat pump or geothermal system relative to a high efficiency gas furnace? Please explain fully.

Interrogatory #13

Ref: Exhibit B, page 44

- a) Would the move to AMI provide EGI with the information to implement a fundamental change in the rate design for the non-contract general service rate classes to include any of the following changes:
 - i) the addition of a demand charge based on the highest consumption day in the month/year;
 - ii) the development of non-contract general service rate classes based on similar peak day demands (for example, one class with peak day demand less than $X \text{ m}^3$, one class with peak day demand more than $X \text{ m}^3$ but less than $Y \text{ m}^3$ and one class with peak day demand more than $Y \text{ m}^3$;
 - iii) a combination of the above such as the implementation of a peak day demand charge for customers in the class with a peak day demand of more than $Y \text{ m}^3$, with no peak day demand charge for the other two classes?
- b) Would the ability to track the peak demand requirements into the three groupings noted in a) ii) above result in a greater ability to forecast peak day requirements? Please explain fully.
- c) Would the use of a peak day demand charge for non-contract general service customers above a certain level (as proposed in a) iii) above) enhance the ability of EGI

to forecast peak day requirements, similar to that for contract customers? Please explain fully.

d) EGI currently uses an annual volume consumption (50,000 m³) to assign non-contract general service customers to different rate classes. If the annual volume consumption criteria were replaced with the peak day demand, would the allocation of costs between the two rate classes be more reflective of cost causality? Please explain fully.

e) Please provide a table that breaks down the peak day design capacity for each of the Union South, Union North and EGD rate zones between contract customers with contracted firm demands and non-contract general service volumes.

Interrogatory #14

Ref: Exhibit B

Please provide a table that shows for each of 2011 through 2020 by rate zone (Union South, Union North, EGD) the normalized annual volume broken down between the contract rate classes and the general service rate classes as well as the design day demand, also broken down between the contract rate classes and the general service rate classes.

Interrogatory #15

Ref: Exhibit C, page 26

With respect to the incremental funding for the pilot projects request that EGI expects to request following approval of an IRP framework for EGI, would EGI seek funding and/or participation from groups such as the federal government, the provincial government, municipal governments, the Heating, Refrigeration and Air Conditioning Institute of Canada, Ontario Geothermal Association, solar associations and companies, etc.? If not, please explain why not.