

Aiken & Associates

578 McNaughton Ave. West
Chatham, Ontario, N7L 4J6

Phone: (519) 351-8624

E-mail: randy.aiken@sympatico.ca

January 12, 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 to
GEC - ED for Enbridge Gas Inc. Application – Integrated Resource Planning
Proposal**

Please find attached the interrogatories of the London Property Management Association for the Green Energy Coalition and Environmental Defence in the above noted proceeding.

Yours very truly,

Randy Aiken
Aiken & Associates

c.c. David Poch (e-mail only)
Chris Neme (e-mail only)

Enbridge Gas Inc.

Integrated Resource Planning Proposal

**INTERROGATORIES OF THE
LONDON PROPERTY MANAGEMENT ASSOCIATION
TO THE GREEN ENERGY COALITION AND ENVIRONMENTAL DEFENCE**

Interrogatory #1

Ref: Exhibit M2, pages 13 – 14

With respect to the goals of a gas IRP framework for Ontario:

- a) The evidence states that any starting point for any IRP is that gas customers' energy needs must be safely met. Please explain why the reference is to gas customers rather than energy customers.
- b) Is it possible that energy customers' energy needs can be safely met through other energy types and without the use of natural gas?
- c) With respect to cost minimization, please explain to whom the relevant cost and benefits are applicable. For example, is it related only to the costs and benefits of the utility or does it include societal costs and benefits and costs and benefits for the customers impacted by the IRP?
- d) With respect to alignment with other government policy objectives, should the governments include the federal, provincial and municipal governments? If not, please explain why not and which government policy objectives would be relevant.
- e) How should an IRP plan take into account potential conflicts in government policy objectives, such as, for example, expansion of natural gas service to currently unserved areas and the reduction of greenhouse gas emissions?
- f) With respect to the equitable consideration of all viable resource options, please define viable.
- g) With respect to the equitable consideration of all viable resource options, do these options include electrification, solar electricity generation, solar water heating, hydrogen, propane, air-source heat pumps, geothermal systems, energy storage, etc.? Are there any options that should not be considered a viable resource option at this time?

h) With respect to the alignment of utility interests with IRP goals, does the author agree that the utility does not need any financial incentive over and above the return on rate base if the most cost-effective solution continues to be a capital investment (pipe or non-pipe), even if the capital investment is less than what it would have been in the absence of the IRP?

i) With respect to the alignment of utility interests with IRP goals, should the utility have a financial incentive where the most cost-effective solution includes the provision of a non-pipe alternative by a third-party supplier that may or may not be a regulated entity?

Interrogatory #2

Ref: Exhibit M2, page 14

a) Is the reference to “a single integrated resource planning process” limited to gas IRP, or is it a broader concept that would include electricity transmission and distribution planning and unregulated energy providers (for example, propane distributors, CNG providers, geothermal providers, solar providers)? If not, please explain why not.

b) Would the “single integrated resource planning process” also include planning and other relevant departments and/or ministries from municipal, provincial and federal governments? If not, please explain why not.

c) In addition to the parties noted in parts (a) and (b) noted above, are there other groups/organizations that should be involved in the “single integrated resource planning process”?

Interrogatory #3

Ref: Exhibit M2, page 15

With respect to the lead time needed, is the reference to load reduction, current annual sales and gas consumption related only to annual gas consumption or does it also encompass peak day and/or hour requirements?

Interrogatory #4

Ref: Exhibit M2, pages 15 – 16

How should the utility ensure that third-party providers of non-pipe alternatives are included in the integrated resource planning process to ensure that these providers are afforded the lead time they need to become a viable option within the planning horizon?

Interrogatory #5

Ref: Exhibit M2, page 44

The evidence states that it would be reasonable for the utility and its shareholders to expect to be able to make money in the acquisition of a combination of resources that balances cost-minimization, risk minimization, carbon emissions reductions and other policy objectives.

a) Please explain if it is reasonable for the utility and its shareholders to make money on assets and/or services that are used as a part of the combination of the resources used that are owned and provided by non-regulated third-party providers.

b) If non-regulated third-party providers are able to provide some or all of the assets and/or services needed to satisfy an IRP, are they entitled to the same expectation as the utility and its shareholders to make money on their assets and/or services?

Interrogatory #6

Ref: Exhibit M2, page 46

For each of the shareholder incentive mechanisms described, please explain the potential impact on competitive third-party non-pipe solution providers. Are incentives available to third-party non-pipe solution providers either through the utility or through some other mechanism?