

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

January 12, 2021

**Re: EB-2020-0091 Enbridge Gas Integrated Resource Planning  
Pollution Probe Interrogatories on Enbridge/ICF Evidence**

Dear Ms. Long:

In accordance with Procedural Order No. 7 dated December 2, 2020 for the above-noted proceeding, please find attached Pollution Probe's Interrogatories on Enbridge/ICF evidence. Please note that Pollution Probe's Interrogatory Appendices were filed as separate files and forwarded to participants as a separate email to avoid issues with file size restrictions. If you have not received the following Interrogatory Appendices, please reach out to the undersigned.

- PollutionProbe\_IR\_Appendix A-Toronto Plan\_20210112
- PollutionProbe\_IR\_Appendix B-Ottawa Plan\_20210112
- PollutionProbe\_IR\_Appendix C-BCUC Guidelines\_20210112
- PollutionProbe\_IR\_Appendix D-ConEd Interim BCA Handbook\_20210112
- PollutionProbe\_IR\_Appendix E-IESO Planning Process\_20210112
- PollutionProbe\_IR\_Appendix F-IESO Engagement\_20210112
- PollutionProbe\_IR\_Appendix G-Ontario Environment Plan\_20210112
- PollutionProbe\_IR\_Appendix H-Ontario MEP Guidelines\_20210112

Respectfully submitted on behalf of Pollution Probe.



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cc: Enbridge (via [EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com))  
OEB Case Manager, Michael Parkes (via email)  
OEB Board Counsel, Michael Millar (via email)  
All Parties (via email)  
Richard Carlson, Pollution Probe (via email)

**ONTARIO ENERGY BOARD**

**Integrated Resource Planning for Natural Gas**

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**POLLUTION PROBE INTERROGATORIES  
ON  
ENBRIDGE & ICF CANADA EVIDENCE**

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**January 12, 2021**

**Submitted by: Michael Brophy  
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Toronto, Ontario M4G 3H4**

**Consultant for Pollution Probe**

Note: For each interrogatory response, please provide the name of the expert witness that completed the response. If the response was not completed by an expert witness, please do not include a name.

Please note that Appendices to the interrogatories were filed as separate documents. A full list is included in the cover letter and if applicable, Appendices are referenced in the Interrogatory if they apply.

Pollution Probe #1

- a) Does Enbridge (including EGD or Union Gas) currently have any policy, procedure or manual (including sections in other manuals) related to IRP? If yes, please provide a copy of all related materials.
- b) Please identify which infrastructure project application (i.e. Leave to Construct) filed by Enbridge (including EGD or Union Gas) that does the best job of considering IRP considerations (e.g. DSM or other). Please provide the project name, a brief description and an explanation of what considerations make the project the best at considering IRP options.
- c) When Enbridge considers cost savings related to decreased pipe size requirements due to IRP options (e.g. DSM or other), what cost per meter installed does Enbridge use to calculate those savings (e.g. comparing costs of NPS 4, 6, 12, 16, 20, etc.)?
- d) Please explain how Enbridge ensures that the cost savings for decreasing pipe size (option analysis) is done on a consistent and defensible basis across all proposed projects. Please provide a table of installed costs by pipe size used if available.
- e) Has Enbridge ever done a capacity assessment of its assets across its system? If yes, please provide a copy of that assessment. If no, how does Enbridge assess which pipelines are under-utilized or reaching capacity?

Pollution Probe #2

Does Enbridge perform IRP-related screenings for any infrastructure projects. If yes,

- a) Please provide a copy of the materials used in the IRP-related screening.
- b) Please describe how the IRP-related screening process was developed and which department owns it.
- c) Please describe how Enbridge currently decides which projects will be subject to an IRP-related screening.
- d) Please provide a list of all infrastructure projects mitigated or reduced due to IRP considerations.

Pollution Probe #3

- a) Please provide a summary of all external stakeholder feedback received by Enbridge on its IRP Proposal prior to it being filed and explain how the feedback was incorporated into the IRP Proposal.

Pollution Probe #4

References:

[Exhibit B]

[PollutionProbe\_IR\_Appendix A-Toronto Plan\_20210112]

[PollutionProbe\_IR\_Appendix B-Ottawa Plan\_20210112]

[PollutionProbe\_IR\_Appendix H-Ontario MEP Guideline\_20210112]

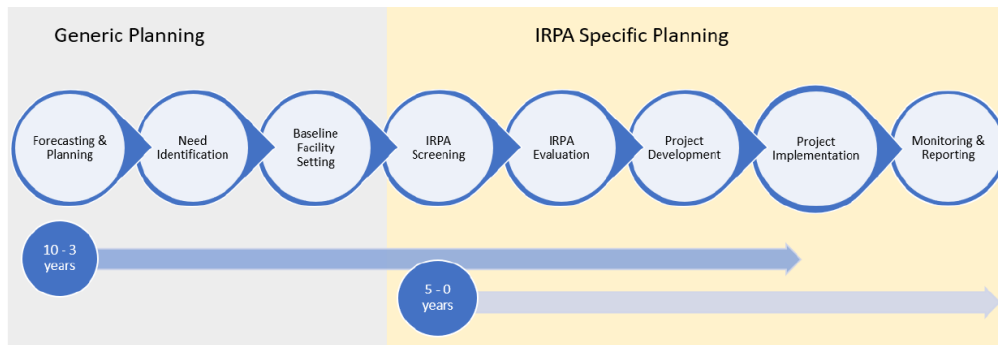
- a) Please describe what steps Enbridge takes to coordinate with municipal energy and emissions plans when considering infrastructure projects.
- b) Please explain how ICF believes that the IRP Framework and planning assumptions should be aligned with community/municipal energy and emissions plans.

- c) Please provide a copy of the RFP and scope of work for the IRP related studies that ICF has conducted for Enbridge (including EGD and Union Gas).
- d) Please explain how Enbridge integrates Ontario municipal energy and emissions plans into its planning assumption for infrastructure planning [MEP links?]

### Pollution Probe #5

[Exhibit B]

Reference: Figure 2.1



- a) Recently, many Leave to Construct projects have been submitted to the OEB within 3 years of the proposed construction date. Please explain what would change from the status quo if the approach outlined in Figure 2.1 was leveraged.
- b) Does Enbridge have a long-term demand forecast and plan that identifies specific needs across its system and required infrastructure? If yes, please provide a copy.
- c) Please explain how the long-term demand forecast and infrastructure plan relates to Enbridge's 5 Year Gas Supply Plan.

Pollution Probe #6

[Exhibit B, Page 4]

Reference: “And while DSM – appropriately underpinned by its own distinct framework - has evolved as experience has been gained, it is anticipated to continue to be essential in continuing to reduce the natural gas usage and energy bills of Enbridge Gas customers for years to come while also continuing to passively mitigate infrastructure needs over time through reduction in annual demand”

- a) Please explain why DSM would only passively mitigate infrastructure needs over time, rather than being used as an active tool to contribute to infrastructure cost mitigation and consumer energy cost savings.
- b) Does the statement above suggest that Enbridge does not believe that DSM is an effective IRP tool? Please explain the answer.
- c) Please provide the amount of DSM annual savings targeted in the Enbridge 2021 DSM Plan, and compare that as a percentage of the 2019 OEB/IESO DSM Potential Study. Please include the calculations.

Pollution Probe #7

[Exhibit B, Page 13]

Reference: “Optimized Scoping - Recognizing that reviewing IRPAs for every forecasted infrastructure project would be extremely time intensive, binary screening should be undertaken to confirm which forecast need(s) should undergo an IRP assessment”

- a) Please provide a list of IRPA activities and related costs estimates for a typical small (below the threshold Enbridge proposes), medium (at the threshold Enbridge proposes) and large project (above the threshold Enbridge proposes).
- b) Please provide a copy of the assessment criteria and any tools Enbridge proposes for the binary screening of projects.
- c) Is there a cost, size or length threshold Enbridge is proposing to use to decide which projects should have an IRPA done.
- d) For projects where an IRPA will not be done, is there any IRP-related assessment proposed?

Pollution Probe #8

[Exhibit B, Page 35]

Reference: “It takes approximately three to five (3 - 5) years to put a facility expansion/reinforcement project into service, including: project selection, preparation of an application to the OEB for LTC and subsequent approval, procurement of land rights, completion of relevant environmental studies and resulting impact mitigation efforts, to obtain all necessary permits, to order materials and to construct the facilities.”

- a) If Enbridge knows that an expansion/reinforcement project is needed in advance, please explain why Enbridge does not identify projects in its OEB filings 3-5 years in advance.
- b) Please provide an illustrative timeline for a project that requires 5 years to put in to service using the categories listed above.

Pollution Probe #9

[Exhibit C, Page 4]

Reference: “Enbridge Gas supports striving for consistency between future IRPA applications and leave-to-construct (“LTC”) applications and their underlying policy frameworks, to the extent reasonably possible”

- a) What scope of assets does Enbridge believe IRP should be applied to (e.g. all current and future assets, or just current assets, future assets only, transmission, distribution)? Please explain.

Pollution Probe #10

[Exhibit C, Page 25]

Reference: “In terms of the broader natural gas system, all indications in the foreseeable future are that Enbridge Gas’s natural gas infrastructure in Ontario will remain used and useful ...”

- a) Please provide a copy of all analysis and materials that were used to develop the statement above.
- b) Please define what was intended by the term “foreseeable future”.

Pollution Probe #11

[Exhibit C]

Appendix C of Enbridge's Reply Evidence (Exhibit C) contains an executed Form A for Expert Witnesses from ICF.

- a) Please provide a complete list of the evidence that the Form A's from ICF pertain to.
- b) Other than the ICF experts identified in the Form A's, does Enbridge have other (internal or external) experts it is putting forward to defend any evidence currently filed? If yes, please provide a list of which experts own which pieces of evidence.

Pollution Probe #12

References:

[ICF IRP Report, Section 2.1] - "Based on a review of the state of the industry, there is no relevant precedent for, or evidence of natural gas utilities consideration of the impact of broad-based DSM, geo-targeted DSM or dedicated DR programs impact on facilities planning. Further, while electric utilities have used DSM and DR programs to reduce the need for new generating capacity and transmission capacity for many years, there is only relatively limited experience deferring distribution system infrastructure."

[PollutionProbe\_IR\_Appendix C-BCUC Guidelines\_20210112]

[PollutionProbe\_IR\_Appendix D-ConEd Interim BCA Handbook\_20210112]

- a) Recent IESO auctions included energy efficiency and other Distributed Energy Resources (DERs) to enable a greater range of IRP solutions. For example, the York Region auction alone exceeded the desired response by 340% (34MW vs. 10MW target). Does ICF agree that these types of examples show capacity to meet Ontario's energy needs through non-traditional IRP solutions? If not, why not.
- b) Pollution Probe has provided two illustrative examples above of specific natural gas IRP related initiatives. One from BCUC started almost 20 years ago and has been matured through regulatory process and effort of the Canadian gas utility (Fortis). The second example indicates an interim gas utility handbook that was developed in 2017 and updated based on stakeholder feedback. Were these



examples identified during the ICF industry review? If yes, why were they not included?

Pollution Probe #13

[PollutionProbe\_IR\_Appendix F-IESO Engagement\_20210112]

Does ICF agree that the IESO Engagement Principles used to coordinate their planning represent best practices? If not, what changes would you recommend?