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January 12, 2021

Christine E. Long  
Registrar  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street  
Toronto ON  
M4P 1E4

Dear Ms. Long

**RE: EB-2020-0091 Enbridge Gas IRP Application  
Energy Probe Interrogatories to GEC/ ED consultant Energy Futures Group**

Attached are the interrogatories of Energy Probe Research Foundation (Energy Probe) to the Green Energy Coalition/ Environmental Defense consultant Energy Futures Group in the EB-2020-0091 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for approval of its Integrated Resource Plan.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi  
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)  
Kent Elson (ED)  
Roger Higgin (SPA Inc.)  
Michael Parkes (OEB Staff)  
David Poch (GEC)  
Adam Stiers (Enbridge Gas Inc.)

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**Energy Probe Research Foundation** 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

Phone: (416) 964-9223 Fax: (416) 964-8239 E-mail: [EnergyProbe@nextcity.com](mailto:EnergyProbe@nextcity.com) Internet: [www.EnergyProbe.org](http://www.EnergyProbe.org)

EB-2020-0091 Enbridge Gas IRP Proposal

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Energy Probe Interrogatories to GEC/ ED Consultant Energy Futures Group.

January 12, 2021

**EP-GEC/ED-1**

**Reference:** GEC/ED/Energy Futures Report, page 6-1.4, Issue #5: Industry Best Practices, 1.4.1 More Granular Load Forecasting.

- a) Please provide more detail what is meant by More Granular Load forecasting.
- b) Please provide examples based on geography, rate classes etc.
- c) Does more granularity require installation of AMI systems? Please discuss in terms of costs/benefits. How would EGI's Gas Supply Plan differ in context of the current approach and more granular forecasts?

**EP-GEC/ED-2**

**Reference:** GEC/ED/Energy Futures Report, page 8

**Preamble:** "The Ontario Energy Board should consider establishing a stakeholder workshop process to identify policy goals relevant to cost-effectiveness analysis in Ontario and to ensure that all relevant costs, benefits, and risks are included in the benefit-cost analysis. This could be led by an external expert that would prepare a draft report for the Board's consideration.

- a) Please clarify what is Stakeholder Workshop to achieve for example whether this is a Task force to review/amend E.B.O.134 and E.B.O.188 Guidelines (or not) and what are the specific outputs expected?
- b) What is the composition of the proposed Workshop/Task Force.

**EP-GEC/ED-3**

**Reference:** GEC/ED/Energy Futures Report, page 8

**Preamble:** "The discount rate used for cost-effectiveness analysis of utility investment decisions should be a function of Ontario's policy objectives. Until an assessment of such objectives has

been performed, the Board should require that the same discount rate used to assess cost-effectiveness of system-wide DSM programs (currently 4%) also be used when comparing the costs and benefits of pipe and non-pipe solutions.”

- a) Is Energy Futures proposing a social discount rate? If so please provide specifics.
- b) For gas infrastructure projects why should not the utility’s Weighted Average Cost of Capital be used? Please Discuss.
- c) What discount rates are used in other jurisdictions? Please provide examples.

#### **EP-GEC/ED-4**

**Reference:** GEC/ED/Energy Futures Report, page 8

**Preamble:** “Conceptually, there are three ways in which utility shareholder incentives for investment in non-pipe solutions could be expressed: (1) incentive payments structured as a percent of the cost of non-pipe solution; (2) capitalizing and earning a return on non-pipe solution costs; and (3) incentive payments based on a percent of net economic benefits (cost savings) resulting from deploying a non-pipe solution instead of a more expensive T&D option.”

How does the option of capitalizing and earning a rate of return on non-pipe solution costs reconcile with using a social discount of 4% on DSM solutions (Page 8)? Please discuss.

#### **EP-GECED-5**

**Reference:** GEC/ED/Energy Futures Report, page 15

**Preamble:** “Some jurisdictions have initial “rough cut” criteria – including lead time – for determining whether a detailed IRPA analysis is warranted. In Vermont, the criteria for consideration of non-wires solutions for deferral of electric transmission system investments are structured around the magnitude of the load reduction required as follows:

- 1 to 3 years for load reductions of 15% or less;
- 4 to 6 years for load reductions of 15% to 20%;
- 6 to 10 years for load reductions of 25%.1”

- a) Does Energy Futures have examples of lead times for gas infrastructure plans and projects? If so please provide a summary by jurisdiction?
- b) Has Energy Futures asked EGI what its lead times are for Infrastructure Plans/Projects? If so summarize the result for both T&D Projects.
- c) Why is Energy Futures proposing a 3-year horizon rather than some other lead time? Please discuss.

**EP-GEC/ED-6**

**Reference:** GECED/Energy Futures Report, page 20, 4.2.3 Simultaneous Consideration of All IRPA Resource Options is Required

**Preamble:** This section focusses on non-pipe alternatives.

- a) How do upstream infrastructure and contracting supply solutions (including storage) fit into consideration of IRP Resource Options? Please discuss.
- b) Please provide a table/matrix of all IRPA Resource Options Energy Futures believes should be included.

**EP-GEC/ED-7**

**Reference:** GEC/ED/Energy Futures Report, page 27

**Preamble:** “Most jurisdictions that are seriously considering gas and electric IRPAs have started with pilot projects to actually field-test and gain experience with planning processes, deploying Geo-targeting efficiency and other IRPA resources, evaluating the impact such geo-targeting is producing, and valuing such impacts and other key aspects of non-pipe solutions.”

- a) Please provide the key features/considerations in developing a gas pilot project.
- b) Other than the Northwest Natural Gas Oregon Project, please provide other gas pilot project examples.

Submitted on behalf of Energy Probe by its consultant,

Roger Higgin  
SPA Inc.