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January 12, 2021

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Christine E. Long, Registrar

Dear Ms. Long:

**Re: Low Income Energy Network (“LIEN”) - Interrogatories
Integrated Resource Planning Proposal by Enbridge Gas Inc.
Board File No. EB-2020-0091**

Please find attached LIEN’s interrogatories in the above-noted matter.

Yours truly,

Madiha Vallani

cc: LIEN Legal Subcommittee
Matt Gardner

Document #: 1875114

LOW-INCOME ENERGY NETWORK (LIEN)
INTERROGATORIES
FOR ENBRIDGE GAS INC'S
INTEGRATED RESOURCE PLANNING PROPOSAL

EB-2020-0091

JANUARY 12, 2021

- 1 Exhibit B, page 26 of 46: *“When compared with other IRPAs, leveraging existing DSM programs may prove to be a cost-effective and efficient means to address peak period demands, recognizing that various factors would still need to be taken into consideration to design and implement an effective solution.”*, and Exhibit C, page 25 of 26 *“Enbridge Gas agrees in principle with EFG’s proposal to develop and implement two pilot projects.”*
 - a) In addition to the ICF IRP Study already filed, we understand that Enbridge plans to conduct two pilot projects. Please provide details about what Enbridge is planning for these pilot projects including details about:
 - i. program design
 - ii. measures/activities
 - iii. timing
 - iv. budget
 - v. geographic areas targeted
 - vi. whether/how Enbridge plans to consider low-income consumers in these pilot projects, and
 - vii. how these pilot projects may be complemented by Enbridge’s existing and/or future DSM programs.
- 2 Exhibit B, page 36 of 46: *“Enbridge Gas expects that any and all of the prudently incurred: (i) original costs to invest in OEB-approved IRPAs; (ii) costs associated with OEB-approved adjustments to IRPA investments; and (iii) costs of any subsequent OEB-approved LTC project (in the instance that an IRPA is determined to have been insufficiently effective), would be borne entirely by ratepayers subject to the Board’s determination that in the course of incurring such costs Enbridge Gas acted prudently and responsibly in serving the firm needs of its ratepayers.”*
 - a) How will Enbridge consider the impact to low-income customers associated with IRPAs?

- b) What mechanisms, if any, is Enbridge considering to reduce costs to low-income customers associated with IRPAs?
- 3 Exhibit B, pages 39 to 42 of 46: “...*Enbridge Gas accepts that there may be room to enhance its stakeholder engagement in order to glean IRP-specific insights. These additional insights could be geographically-specific and include information on customer types (e.g., residential, commercial, industrial), socioeconomic customer attributes, housing stock, saturation of current DSM programming, and an understanding of the status of electricity CDM programs as well as transmission and distribution capacity*”, and Exhibit C, page 13 of 26: “*Enbridge Gas acknowledges the importance of obtaining stakeholder input ahead of developing IRPAs to address identified system needs/constraints and of establishing a feedback loop to keep stakeholders (including municipal and government representatives, First Nations, end use customers from all sectors, customer and business associations) informed of its investments in and the impact of their respective input into the development of IRPAs.*”
- a) What is Enbridge’s plan for consulting with low-income consumers? Through what channels (social service agencies, LIEN, others)? Please provide a breakdown of how Enbridge intends to roll-out this consultation with low-income consumer representatives for each of Enbridge’s engagement components 1, 2 and 3.
- b) As part of engagement component 3, how will Enbridge determine (i.e., what criteria will Enbridge apply) to determine if/how Enbridge will consult with low-income consumer representatives on a geographically-targeted basis?
- c) Does Enbridge intend to engage with stakeholders, including low-income consumer representatives, concurrently about both IRPAs and DSM programming, including low-income DSM programming? How will this engagement occur?
- 4 Exhibit C, page 8 of 26 “*In its Additional Evidence, Enbridge Gas proposed that economic feasibility of IRPAs be assessed using a DCF methodology consistent with principles underpinning the Board’s E.B.O. 134 and E.B.O. 188. The primary difference between Enbridge Gas’s proposal and ConEd’s BCA is one of perspective: Enbridge Gas’s proposed DCF-based test being premised upon an economic assessment of impacts/benefits to Enbridge Gas’s ratepayers as its starting point followed by secondary and tertiary objective assessments of distinct and quantifiable public interest costs and benefits...*”
- a) What does Enbridge propose to consider as part of its:
- i. economic assessment of impacts/benefits to customers, and
 - ii. secondary and/or tertiary assessments of public interest costs and benefits?

- b) Will Enbridge consider as part of these assessments:
- i. health and safety impacts
 - ii. disconnection and connection impacts/costs
 - iii. costs/benefits specific to low-income customers?

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