

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 GEC/ED 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 GEC/ED 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)
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

**POLLUTION PROBE INTERROGATORIES
ON
GREEN ENERGY COALITION/ENVIRONMENTAL DEFENCE
EVIDENCE**

January 12, 2021

**Submitted by: Michael Brophy
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Consultant for Pollution Probe

Note: It has been assumed that Chris Neme will defend all interrogatory responses related to the GEC-ED evidence. If any responses are allocated to a different witness, please provide the name of the witness for that response.

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

Pollution Probe #1

[Exhibit M2.GEC-ED]

- a) Please rank the following IRP approaches from best to worst from a consumer, policy and cost-effectiveness perspective, and explain the ranking.
 - Siloed energy planning by fuel type (e.g. natural gas, electricity, renewables, etc.)
 - Planning by fuel type with a mandated consideration of benefits and costs against other fuel options.
 - Fully fuel-agnostic energy planning
- b) If an energy option other than a new natural gas pipeline is the best IRP alternative resulting from an assessment (e.g. geothermal), please explain the role of the regulator and utility to ensure that the best option is implemented?

Pollution Probe #2

[Exhibit M2.GEC-ED]

Reference: In Section 1.3.2 you recommend that the IRP framework should require utilities to prepare and publish an annual T&D needs summary based on a rolling 10-year forecast of needs, the drivers behind those needs, whether the needs may be candidates for non-pipe solutions (and why or why not), and the status of consideration of non-pipe solutions for each identified need.

- a) Should the annual assessment be part of the annual rate case or a separate process (e.g. like the Gas Supply Plan Review)? Please explain why.
- b) Please confirm that review of the rolling 10 Year IRP Plan does not remove other statutory requirements that Enbridge would need (e.g. Leave to Construct project reviews or approval to place any amounts into rates like done through a Rate Case).

Pollution Probe #3

[Exhibit M2.GEC-ED]

Reference: In Section 1.5.2 it is suggested that the “TRC+” test be used for IRP until a better alternative is available.

- a) Please indicate why the TRC+ test is better than the Societal Cost Test.
- b) Does TRC+ include emissions (e.g. carbon) pricing? If not, should that be added?

Pollution Probe #4

[Exhibit M2.GEC-ED]

Reference: Section 4.1. identifies six Goals for a Gas IRP Framework in Ontario.

- a) Please explain how the reliability goal would apply to gas expansion projects (e.g. to new customers that may have cleaner or more-cost effective energy options).
- b) For ‘cost minimization’ and ‘risk minimization’, please confirm this is from the customers perspective. If not, please explain.
- c) Do you agree that the following steps are appropriate for natural gas IRP. If not, please explain what should be different.

Scenario 1: Potential Gas Expansion	Scenario 2: Existing Gas Infrastructure/ Customers
Assess Consumer Energy Needs	Assess Future Demand
Assess Fuel / Technology Options	Identify Demand-Side or other IRP Options
Select Preferred IRP Option (or mix)	Assess Options and Apply Beneficial Mix
Assess Demand-Side Mitigation Potential	Identify Infrastructure Options, Cost and Benefits
Identify Infrastructure Options, Cost and Benefits	Assess Options
Assess Options	Select Preferred Infrastructure Option
Select Preferred Infrastructure Option	

- d) Community energy and emissions planning is supported by the Province of Ontario and used by municipalities across Ontario to support effective energy planning and reach emission reduction goals. Is this included under one the six goals identified or should it be included as a seventh. Please explain.

Pollution Probe #5

[Exhibit M2.GEC-ED]

Reference: Section 4.3.2 indicates that two pilot projects in 2021 would be appropriate.

- a) In a recent Leave to Construct application (EB-2020-0192 London Line Replacement) Enbridge conducted a DSM option assessment, but used only two years of DSM benefits rather than the full measure life (as required in the OEB DSM Framework) to do the cost-benefit comparison against the preferred pipeline option. Please specify what controls the OEB would need to put in place to ensure that proper analysis is conducted for the IRP Framework or any pilots.
- b) If two pilots were done, would it make sense to conduct one on an existing pipeline that needs to be replaced and one for a project to feed new customers? If not, why not and what is recommended.
- c) Given that Enbridge will file its next generation DSM Plan in 2021, what elements should be included in that plan to enable any pilots (e.g. budget)?

Pollution Probe #6

[Exhibit M2.GEC-ED]

Reference: Section 4.4. suggests "Focusing initially on projects with at least a 3-year lead time for consideration of non-pipe solutions is reasonable".

- a) The OEB proposed DSM planning and funding cycle is five years. How should DSM alternatives be funded if they fall inside the five year DSM cycle and were not budgeted for in that cycle?

Pollution Probe #7

[Exhibit M2.GEC-ED]

Reference: Section 4.5 related to Cost Recovery and Financial Incentives.

- a) For incenting non-gas alternatives, what controls would need to be put in place to restrict monopoly power issues (e.g. Enbridge affiliates or picking winners and losers in the competitive market for geothermal)?

Pollution Probe #8

References:

[EB-2020-0136, Reply Argument of Enbridge Gas, November 17, 2020, Page 9 of 23] -
"For current planning purposes, the Company cannot assume that the emissions and gas consumption reduction targets set out in the Made in Ontario Environment Plan (MOEP) or the City of Toronto's TransformTO initiative will be met."

[PollutionProbe_IR_Appendix A-Toronto Plan_20210112]

[PollutionProbe_IR_Appendix G-Ontario Environment Plan_20210112]

- a) Based on best practices, what is the best manner to ensure alignment between utility IRP planning assumptions and government energy and emissions planning and policy?
- b) Please provide any relevant recommendations on how the OEB could bridge the gaps between long-term utility planning and government planning and policy assumptions.

Pollution Probe #9

References:

[PollutionProbe_IR_Appendix C-BCUC Guidelines_20210112]

[PollutionProbe_IR_Appendix D-ConEd Interim BCA Handbook_20210112]

[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.”

- a) 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. Additional transferable experience is also available from entities such as IESO. Do you agree with the major finding by ICF that there are little to no best practices available to inform gas IRP in Ontario? Please explain your answer.
- b) If there are limited precedents to draw from, what is the best approach to ensure that the IRP Framework is robust enough to meet Ontario’s energy needs for the future?

Pollution Probe #10

[Exhibit M2.GEC-ED]

[PollutionProbe_IR_Appendix F-IESO Engagement_20210112]

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