



**Adam Stiers**  
Technical Manager  
Regulatory Applications  
Regulatory Affairs

Tel: (519) 436-4558  
Email: [astiers@uniongas.com](mailto:astiers@uniongas.com)  
[EGIRegulatoryProceedings@enbridge.com](mailto:EGIRegulatoryProceedings@enbridge.com)

**Enbridge Gas Inc.**  
P.O. Box 2001  
50 Keil Drive N.  
Chatham, Ontario, N7M 5M1  
Canada

January 12, 2021

BY RESS AND EMAIL

Ms. Christine Long  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)  
Ontario Energy Board File No.: EB-2020-0091  
Integrated Resource Planning Proposal  
Enbridge Gas Interrogatories to OEB Staff**

---

In accordance with Procedural Order No. 7 issued by the Ontario Energy Board ("OEB" or "Board") on December 2, 2020, enclosed please find Enbridge Gas interrogatories to OEB Staff and Guidehouse Canada Ltd. ("Guidehouse") for the above noted proceeding.

If you have any questions, please contact the undersigned.

Sincerely,

(Original Digitally Signed)

Adam Stiers  
Technical Manager, Regulatory Applications

cc.: D. Stevens (Aird & Berlis)  
M. Parkes (OEB Staff)  
M. Millar (OEB Counsel)  
EB-2020-0091 (Intervenors)

**ENBRIDGE GAS INC.  
INTEGRATED RESOURCE PLANNING PROPOSAL:**

**Written Interrogatories of Enbridge Gas Inc. to Ontario Energy Board Staff and  
Guidehouse Canada Ltd.**

**Issue 4 - Will the IRP Framework necessitate consequential changes to any other OEB policies, rules, or guidelines? If so, which policies, rules, or guidelines might be affected, and how should these changes be addressed?**

**Enbridge 4.1**

**Reference:** Recommendations

**Preamble:** The evidence states that “The OEB should encourage the development of a comprehensive Benefit Cost Analysis (BCA) Handbook for Gas IRP, or supplemental guide to the approach outlined in E.B.O. 134, that evaluates infrastructure, supply-side, and demand-side solutions with a similar set of assumptions for costs and benefits.”

**Question:**

Please explain any adjustments that might be needed to E.B.O. 134 (all stages) for it to be capable of effectively comparing facility and non-facility alternatives (IRPAs or NPAs).

**Issue 5 - What are industry best practices for IRP, and how are they applicable to the Ontario context?**

**Enbridge 5.1**

**Reference:** Executive Summary

**Preamble:** The evidence states that “New York Department of Public Service (DPS) staff are expected to publish a whitepaper that outlines a proposal to modernize the gas system planning before November 16th, 2020.”

**Question:**

- a) Please provide an update on the status of this paper including when it is expected to be published.
- b) Please summarize what findings from the whitepaper Guidehouse anticipates will be directly applicable to the establishment of an IRP Framework for Enbridge Gas and more generally to natural gas IRP in Ontario.

**Enbridge 5.2**

**Reference:** Executive Summary

**Preamble:** The evidence states that “Non-traditional supply-side and demand-side solutions carry greater uncertainty compared to traditional infrastructure projects, and utility program managers have overcome these risks by oversubscribing customers and diversifying the IRP solutions.”

**Question:**

To your knowledge, do utilities in New York also oversubscribe customers to firm upstream transmission and supply assets? If so, have utilities established guidelines or limits to how oversubscribed they can be and still receive pass-through treatment of costs? If not, why is it appropriate to oversubscribe customers to NPAs and not pipeline solutions?

**Enbridge 5.3**

**Reference:** Section 1.0 Introduction

**Preamble:** The evidence provides an overview of the relative size and markets served by Consolidated Edison Inc. and National Grid.

**Question:**

Please explain the unique system constraints experienced by New York State utilities that have influenced their respective natural gas IRP initiatives and planning. Please contrast these constraints to Ontario and Enbridge Gas's systems.

**Enbridge 5.4**

**Reference:** Page 36

**Preamble:** The evidence states that "Similar to Con Edison's funding request for the Smart Solutions program, the utilities requested additional NWA program funding to incorporate incremental EE/DR into their existing programs and also develop new programs covering distributed solar and gas-fired generation, battery storage, and other technologies. In the cases of EE/DR, the NWA programs adjusted incentive levels, measure offerings, and geographic scope to address the specific NWA needs, as highlighted in the example below."

**Question:**

- a) Was the request for additional funding for NWA programs (existing and new) contained within one integrated budget envelope with distinct offers and different evaluation, measurement and verification protocols based on program targets?
- b) Please comment on incremental funding and resources requested by utilities in New York State related to the administration and operationalization of natural gas IRP, including the quantum and nature of funding requested (i.e., related administrative costs, system costs, incremental FTE...).

**Enbridge 5.5**

**Question:** Does Guidehouse have any specific concerns with the way that ICF has described the IRP Framework and landscape in New York State in its Updated Jurisdictional Review included with Enbridge Gas's Additional Evidence filed October 15, 2020? Please detail any such concerns.

**Issue 6 - What screening criteria and methodology should be adopted to evaluate and compare IRP Alternatives (IRPAs) with one another and with facility projects?**

**Enbridge 6.1**

**Reference:** Recommendations

**Preamble:** The evidence states that “The OEB should encourage the development of a comprehensive Benefit Cost Analysis (BCA) Handbook for Gas IRP, or supplemental guide to the approach outlined in E.B.O. 134, that evaluates infrastructure, supply-side, and demand-side solutions with a similar set of assumptions for costs and benefits”

**Question:**

Please provide more specific detail regarding Guidehouse’s recommendations for the content of a future BCA Handbook for Ontario natural gas IRP should the Board determine that it is appropriate to develop one.