



January 12, 2021

VIA RESS

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

Dear Ms. Long:

**Re: Enbridge Gas Inc. (EGI) Integrated Resource Planning Proposal Application
Board File No.: EB-2020-0091**

We are counsel to Anwaatin Inc. (**Anwaatin**) in the above-noted proceeding. Please find attached the interrogatories of Anwaatin to EGI, which are filed in accordance with Procedural Order No. 7.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan McGillivray". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jonathan McGillivray

c. Regulatory Affairs, Enbridge Gas Inc.
Larry Sault, Anwaatin Inc.
Don Richardson

Encl.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*,
1998, S.O. 1998, c. 15, Sched. B, as amended (the
Act);

AND IN THE MATTER OF an application by Enbridge
Gas Inc. for a determination that its Integrated
Resource Planning Proposal is reasonable and
appropriate.

EB-2020-0091

INTERROGATORIES OF
ANWAATIN INC. (Anwaatin)
TO
ENBRIDGE GAS INC.

January 12, 2021

Question: Anwaatin-1

Reference:

- Exhibit B, paras 30 and 90-93.
- Exhibit C, paras 29-31.

Preamble: Enbridge Gas Inc. (**EGI**) indicates that it will file Integrated Resource Planning (**IRP**) alternatives (**IRPAs**) applications that lay out respective anticipated savings or peak period impacts together with associated costs and ownership/operationalization arrangements. EGI indicates that it intends to consult with any impacted landowners, municipalities, First Nations, Indigenous groups, and other affected stakeholders prior to filing any IRPA application with the Ontario Energy Board (the **Board**).

Consequently, EGI's IRP Proposal (the **IRP Proposal**) may constitute, inform, or underpin strategic higher level decisions in relation to natural gas infrastructure and the selection of IRP alternatives (**IRPAs**).

In its [Decision and Order in EB-2017-0319 dated October 18, 2018](#), the Board confirmed that "strategic, higher level decisions can trigger the duty to consult" First Nation and Métis communities (p. 25).

a) Please describe, in detail, and provide evidence for whether — and, if so, how — EGI will determine, interpret, and apply:

- (i) its procedural requirements;
- (ii) the Crown's procedural requirements; and
- (iii) the Board's procedural requirements;

in assisting the Crown in fulfilling its duty to consult and accommodate First Nation and Métis communities in relation to IRP, the planning of natural gas infrastructure, and the selection of IRPAs.

b) Please provide a detailed outline of EGI's Indigenous consultation process with respect to the IRP Proposal. Please include a description of all steps that EGI has taken or will take in order to engage, consult, and accommodate Indigenous communities on the IRP Proposal.

c) Please indicate whether EGI has or expects to make capacity funding available to Indigenous communities in order to facilitate their participation

in relation to IRP, the planning of natural gas infrastructure, and the selection of IRPAs.

- d) Please place EGI's Indigenous consultation policy with respect to IRPAs on the record in this proceeding.
- e) Please describe, in detail, EGI's plans and modalities for involving Indigenous rights-holding communities in the IRP process and selection of IRPAs.

Question: Anwaatin-2

Reference: • Exhibit B, paras 22 and 28.

Preamble: EGI notes that its IRP Proposal and the illustrative process plan are underpinned by guiding principles, one of which is public policy. EGI notes that “IRP will be considered in a manner to ensure that it is supportive of and aligned with public policy, where appropriate.” Alignment with public policy is also considered in the second stage of IRPA evaluation.

- a) Please outline the current areas of public policy that EGI believes should be supported by, and aligned with:
 - (i) its IRP Proposal; and
 - (ii) the IRPA evaluation process.
- b) How does EGI propose to monitor and report on the effectiveness of the IRP Proposal and the IRPA evaluation process in their support for, and alignment with, public policy? Please provide an example or examples.
- c) Does EGI believe that its IRP Proposal and the IRPA evaluation process supports and is aligned with EGI’s consideration of non-gas or blended gas alternatives? If so, please explain why. If not, please explain why not.
- d) Does EGI believe that its IRP Proposal and the IRPA evaluation process supports and is aligned with the expansion of natural gas access to First Nation reserve communities and off-reserve First Nation Members? If so, please explain why. If not, please explain why not.

Question: **Anwaatin-3**

Reference: • Exhibit B, para 38(v).

Preamble: EGI states that “[i]f a project has been driven by policy and related funding to explicitly deliver natural gas into communities to help bring heating costs down, then it is not reasonable to conduct an IRP analysis.”

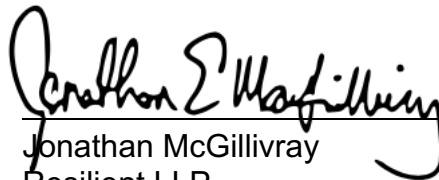
- a) Please explain the above statement, including its underlying rationale.
- b) Please clarify whether EGI believes that it is not appropriate to consider IRPAs in situations where community expansion is underway. Please explain.

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS

12th day of January, 2021



Lisa (Elisabeth) DeMarco
Resilient LLP
Counsel for Anwaatin



Jonathan McGillivray
Resilient LLP
Counsel for Anwaatin