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January 12, 2021

VIA E-MAIL

Ms. Christine Long
Registrar & Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2020-0091 – Enbridge Gas Inc. Integrated Resource Planning Proposal
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

(Original Signed By)

John Lawford
Counsel for VECC

Copy to: Enbridge Gas Inc. Regulatory Affairs

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EB-2020-0091

Enbridge Gas Inc.

Integrated Resource Planning Proposal (IRRP)

VECC Interrogatories January 12, 2021

VECC-1

Ref: Ex B P13

Enbridge Gas's IRP Proposal are underpinned by four Guiding Principles. With respect to Public Policy, Enbridge Gas indicates the IRP will be considered in a manner to ensure that it is supportive of and aligned with public policy, where appropriate.

Please specify the existing public policy that Enbridge Gas is most focused on in considering IRPAs.

VECC-2

Ref: Ex B P13

The evidence states "...Enbridge Gas proposes an IRP process plan that takes into account its existing forecasting and system planning processes which provide critical input to the development of a fulsome Asset Management Plan ("AMP") designed to meet the forecasted firm contracted peak period demands of customers. As set out in Figure 2.1, following OEB approval of an IRP framework, Enbridge Gas will incorporate its IRP Proposal into its existing planning processes and review qualifying facility needs for potential IRPAs."

- a) Does Enbridge Gas foresee the need for any significant changes to the design and execution of its existing planning processes as a result of incorporating an IRP Proposal into its existing planning processes? Please discuss.
- b) Does Enbridge Gas foresee the need for new recruits as a result of incorporating an IRP Proposal into its existing planning processes? Please discuss.
- c) Does Enbridge Gas foresee the need for additional staff/executive training as a result of incorporating an IRP Proposal into its existing planning processes? Please discuss.
- d) Does Enbridge Gas consider incorporating its IRP Proposal into its existing planning processes as a cultural shift within the organization? Please discuss.
- e) Please discuss any potential obstacles with respect to incorporating its IRP Proposal into its existing planning processes and the impact of these obstacles.

VECC-3

Ref: Ex B P19

In Enbridge Gas's 2019 IRP Policy Proposal, there was a table (Table 3.1) that summarized project attributes supporting the relevance of IRPAs. Since the time of that filing, and through its continued learnings about IRP, Enbridge Gas has evolved its thinking around the criteria that would constitute a binary screening for IRP assessment.

As a result of reviewing the expert evidence filed by OEB Staff and GEC/ED, how has Enbridge Gas evolved its current thinking around the criteria that would constitute a binary screening for IRP assessment?

VECC-4

Ref: Ex B P20

The evidence states....."The urgent timing and nature associated with most safety-related projects (e.g., requiring replacement of short pipeline segments), including integrity projects, does not allow for the lead times necessary for developing IRPA solutions."

Please confirm Enbridge Gas' latest thinking regarding the lead time threshold necessary for developing IRPA solutions.

VECC-5

Ref: Ex B P20

With respect to the Community Expansion & Economic Development criterion, Enbridge Gas indicates if 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.

Is Enbridge Gas aware of any community expansion projects in other jurisdictions where an IRP analysis was conducted to help bring costs down and potentially defer, avoid or reduce new facility infrastructure? Please discuss.

VECC-6

Ref: Ex B P21-25 Gas and Non-Gas Alternatives Paragraphs 40-51

Enbridge Gas notes that RNG may be cost prohibitive especially as it compares to new natural gas infrastructure.

- a) Does Enbridge Gas currently consider any other innovative technologies to be cost prohibitive?
- b) Please explain how Enbridge Gas plans to prioritize and optimize innovative technologies in the context of IRPAs.

VECC-7

Ref: Ex B P26

Enbridge Gas indicates it will keep a close eye on DR pilots in the residential space.

Please discuss the current potential for low income DR pilots in the residential space.

VECC-8

Ref: Ex B P26

Enbridge Gas indicates “Ultimately, cost/economic evaluation together with consideration of system reliability, safety and sustainability and broadly protecting the interests of customers will enable Enbridge Gas and the Board to determine whether it is preferable to proceed with investment in an IRPA.”

Please provide Enbridge Gas’ definition of sustainability in this context.

VECC-9

Ref: Ex B P31

The project horizon will be set to align with the OEB-approved depreciable life of the infrastructure asset(s) to which the IRPA is being compared.

Please discuss if any other options were considered to set the project horizon.

VECC-10

Ref: Ex B P39-42

Stakeholder engagement for IRP will include three engagement components.

Please discuss Enbridge Gas’ current thinking with respect to reaching low income customers to provide input on IRP-related matters and whether any enhancements to current practices are needed and being considered.

VECC-11

Ref: Ex B P42-46

Enbridge Gas indicates the deployment of an AMI system, including ultrasonic meters, allows for the collection of frequent interval data that Enbridge Gas requires to effectively target IRPAs and to monitor and verify their effectiveness to ensure that the IRPAs are performing as

expected and to ensure peak period demand reductions are materializing. However, Enbridge Gas is not proposing to deploy AMI at this time.

- a) Please provide an overview of Enbridge Gas' current state with respect to AMI.
- b) Please provide the work activities, costs and timelines needed to fill this gap and effectively deploy an AMI system in order to target IRPAs and monitor and verify their effectiveness.
- c) Please explain further why Enbridge Gas is not proposing to deploy AMI at this time.
- d) Please discuss the optimal time for Enbridge Gas to deploy an AMI system.

VECC-12

Ref: Ex C P6

Regarding Value of Pilot Projects, Enbridge Gas supports EFG's recommendation that two pilot projects be developed by Enbridge Gas in 2021 and launched in 2022 to gain further experience and insights around planning, implementing and tracking IRPAs.

- a) Please discuss Enbridge Gas' current thinking with respect to two potential candidates for pilot projects.
- b) Please provide more details on the formal process needed to identify, scope and select candidate pilot projects and the potential cost and time implications.

VECC-13

Ref: Ex C P25, P

At Page 26, Enbridge Gas proposes that the pilot projects be selected and implemented following the development and issuance of an IRP Framework for Enbridge Gas.

At Page 25, Enbridge Gas indicates it could then apply the learnings from those pilot projects to future IRPAs.

Please discuss how Enbridge Gas' proposed IRPP Framework incorporates a mechanism for continuous improvement so that learnings from those pilot projects can be applied to future IRPAs.