

January 12, 2021

Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms Long:

EB-2020-0091 – Enbridge Gas Inc. Integrated Resource Planning Proposal – CCC IRs

Please find, attached, interrogatories on behalf of the Consumers Council of Canada for Enbridge Gas Inc. pursuant to the above-referenced proceeding.

Please feel free to contact me if you have questions.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: All parties

INTERROGATORIES FOR ENBRIDGE GAS INC.

FROM THE CONSUMERS COUNCIL OF CANADA

RE: EB-2020-0091 – INTEGRATED RESOURCE PLANNING PROPOSAL

CCC-1

Ex. B

Please file all materials provided to EGI's Board of Directors related to this Application.

CCC-2

Ex. B

Please indicate the extent to which EGI has consulted with the Ontario Government Ministries – the Ministry of Energy, Northern Development and Mines and the Ministry of Environment, Conservation and Parks regarding its IRP proposals. Please file all materials related to any such consultations (written correspondence, presentations etc.)

CCC-3

Ex. B, p. 2

Please set out, in detail, the specific approvals being sought by EGI through this Application.

CCC-4

Ex. B, p. 5

Has EGI conducted an updated Avoided Distribution Cost Study since the original study (EB-2015-2020)? If so, please provide that updated study. If not, does the original study continue to be relevant?

CCC-5

Ex. B, p. 20

Please explain, in detail, why community expansion projects driven by public policy and related funding should not be subject to an IRP analysis.

CCC-6

Ex. B/p. 21

Please provide a detailed list of all of the technologies or types of technologies EGI considered as potential candidates for IRPAs. For each of those technologies please explain why they have been rejected at this time.

CCC-7

Ex. B, pp. 21-30

EGI has set out and described a number of technologies that would qualify as IRPAs. Please identify the technologies that EGI might consider first. Please explain why these technologies would be given priority over others. In effect, which are most feasible at this time vs those that may not yet be viable options.

CCC-8**Ex. B, p. 22**

Please provide a detailed overview of the ConEd Gas CNG and National Grid CNG projects.

CCC-9**Ex. B/p. 24**

Please explain how a district energy project works to avoid natural gas pipeline construction. Please indicate to what extent there are district energy projects in place in EGI's franchise area. For each of those projects please provide detailed descriptions and explain how those projects are providing benefits to EGI natural gas ratepayers.

CCC-10**Ex. B, p. 27**

Please explain why Enhanced Targeted Energy Efficiency programs could not be part of the post 2021 DSM plans.

CCC-11**Ex. B, pp. 30-31**

Please provide a detailed example of how a potential project will be run through EGI's DCF analysis. Please include all assumptions. How does EGI intend to estimate incremental overheads, incremental O&M costs, municipal property taxes?

Ex. B, p. 31**CCC-12**

How often does EGI intend to update its Asset Management Plan? When was the current plan finalized? When is the next plan expected to be completed?

CCC-13**Ex. B/p. 36**

EGI describes what it sees as incremental risk associated with the implementation of IRPAs. Why is it "entirely reasonable that ratepayers not shareholders bear the costs associated with the success or failure of such investments."? In proposing and implementing investments in IRPAs what, if any, are the risks to EGI's shareholders? If EGI follows its own policies, feasibility analyses and modelling in proposing an IRPA, and the project does not result in the anticipated avoidance of costs or reduced investment in facilities as proposed, why should EGI's ratepayers bear all of the costs?

CCC-14**Ex. B, p. 44-46**

EGI is not proposing to deploy Advanced Metering Infrastructure at this time. The evidence states that EGI will continue to assess the feasibility of an AMI implementation and it may be in a position to advance AMI-specific applications and a viable roll-out strategy to the Board as soon as 2022. Please provide any reports or analyses EGI has either contracted for, or carried

out internally, assessing the overall cost of deploying an AMI system. How long would it take for EGI to fully implement an AMI system?

CCC-15

Ex C. p. 4

The evidence states that, "...consistent with the Board's repeated determinations in this proceeding that it is not appropriate to duplicate matters/efforts that have been or are anticipated to be dealt with in other proceedings, the Board should remain focused on developing an IRP Framework for Enbridge Gas and not encourage re-hearing matters previously decided or currently before the Board in other proceedings or that are more appropriately dealt with through forthcoming proceedings." Please explain what proceedings EGI is referring to. In what context is EGI making this statement?

CCC-16

Ex. C, p. 26

The evidence states, 'When assessing the feasibility of natural gas facility (pipeline) infrastructure and comparing them to IRPAs, the Board should establish a staged economic evaluation standard to IRPAs through this proceeding that ultimately resembles a modified version of the OEB's E.B.O. 134 Guidelines or a DCF+ test.' Please set out, in detail, what EGI is proposing as either a modified version of E.B.O. 134 or a DCF+ test. Is EGI asking for OEB approval of a specific methodology?

CCC-17

Ex. C, p. 17

The evidence states, "Consistent with its Additional Evidence. Enbridge Gas reiterate that should the Board wish to encourage Enbridge Gas to prioritize investments in IRPAs, in order to meet certain established targets, then it could consider adding an incremental incentive for such successful investments (e.g. an incentive based on the net benefits achieved.)". Doesn't EGI have an obligation, as a regulated entity to implement the optimal solution (pipe or non-pipe) that is the best solution for its customers? If not, why not? Please provide a complete list of incentive mechanisms EGI has assessed. Please indicate which incentive mechanism is EGI's preferred approach. At what point should the OEB establish an incentive mechanism?

CCC-18

Ex. C, p. 21

EGI notes that it and its ratepayers have witnessed and been subjected to rapid and meaningful environmental policy changes in recent years. In the past five years alone there have been drastic changes in government policy, that make reliance on long-term impacts of those policies, difficult at best, and, more often than not high risk in nature. These changes came at significant administrative and regulatory costs to ratepayers. Please explain how EGI will manage this risk in the future especially with respect to its implementation of IRPAs.

CCC-19

Ex. C, p. 26

EGI has provided a discussion regarding pilot projects and the timeline for those projects. Has EGI determined which projects it might pursue as pilot projects? If so, please describe the projects, the technologies and specify how those projects were selected. What type of projects are, from EGI's perspective the most cost-effective? Under what mechanism will EGI seek incremental funding for these pilots during the deferred rebasing period?

CCC-20

Ex. A/B/C

In effect, the OEB, in both its GTA Project Decision (EB-2012-0451) and the 2015-2020 DSM Report directed EGI (formerly EGD and Union Gas) to develop an IRP transition plan.

In the absence of OEB Direction regarding IRP would EGI be developing an IRP Framework? If not, why not? Does EGI have concerns with ICF's conclusions that there has been little progress on implementation of IRP across North America, apart from New York State, since 2018?