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February 2, 2021

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

Dear Ms. Long

**RE: EB-2020-0181 Enbridge Gas Inc. 2021 Rates Phase 2
Energy Probe Submission on the Technical conference**

In a letter of January 29, 2021, Enbridge Gas Inc. suggested that the OEB limit the length and the scope of the Technical Conference. Specifically, Enbridge suggested the following limits.

- *The scope of the technical conference should be expressly limited to items that are at issue in relation to Enbridge Gas's request for approval of ICM unit rates related to the three 2021 ICM Projects, and should not include revisiting or examining items that have been or will be considered in the LTC applications for the 2021 ICM Projects.*
- *A one day technical conference should be sufficient for parties to ask follow-up questions on relevant interrogatories in this proceeding.*

On February 1, 2021, the Federation of Rental-housing Providers of Ontario (FRPO), sent a letter to the OEB explaining why the Technical Conference should not be constrained because the OEB would benefit from a greater understanding of the Utility System Plan filed by Enbridge. Energy Probe supports the suggestion by FRPO.

Energy Probe endorses FRPO's view that the USP should be in scope in the technical conference and would like to add the following points regarding Enbridge's suggestion to limit questions regarding ICM funding for projects with LTC applications.

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Since the merger of Enbridge Gas Distribution and Union Gas was approved by the OEB the merged company, Enbridge Gas Inc., has applied for approval of a series of large and expensive pipeline replacement LTC projects, each apparently sized to obtain ICM funding from ratepayers.

To obtain OEB approval for ICM funding for project(s) in a particular year, the applicant utility has to prove that its capital spending forecast in that year exceeds a threshold established by the ICM threshold formula. For Enbridge, much of the evidence for threshold capital spending for 2021 and for future years is its USP.

ICM funding was originally approved by the OEB for electricity distributors. When an electricity distributor applies for ICM funding for a project, it presents all of the supporting evidence for the project in its rates application allowing intervenors to test the evidence. However, Enbridge only presents summary evidence for a project for which it is seeking ICM funding in its rate case with the bulk of the evidence in the LTC application. This severely limits the ability of intervenors to test the evidence unless they also intervene in the LTC proceeding, particularly if the OEB decision in the LTC proceeding precedes the rates proceeding. Some of the intervenors, including Energy Probe, have intervened in a few of the LTC proceedings but others have not. Intervenors should not be limited from examining all aspects of proposed ICM projects in this proceeding.

For these reasons, the Technical Conference should not be limited to only one day or to the scope as Enbridge suggested.

Respectfully submitted on behalf of Energy Probe,

Tom Ladanyi
TL Energy Regulatory Consultants Inc.

cc. Patricia Adams (Energy Probe Research Foundation)
Enbridge Gas Inc. (Regulatory Proceedings)
Roger Higgin (Sustainable Planning Associates Inc.)
Khalil Viraney (OEB Staff)

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