

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

March 26, 2021

**Re: EB-2021-0004 – Enbridge 2021 Annual Update to 5 Year Gas Supply Plan
Pollution Probe Stakeholder Conference Questions**

Dear Ms. Long:

Please find attached Pollution Probe's questions for the Stakeholder Conference planned for April 26 & 27, 2021.

Respectfully submitted on behalf of Pollution Probe.



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cc: Enbridge Regulatory (email via EGIRegulatoryProceedings@enbridge.com)
Joel Denomy, Enbridge Regulatory (via email)
David Stevens, Aird & Berlis (via email)
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All Parties (via email)
Richard Carlson, Pollution Probe (via email)

EB-2021-0004 Enbridge 5 Year Gas Supply Plan

Please find below Pollution Probe's Questions for Stakeholder Conference April 26 & 27, 2021.

Pollution Probe #1

Reference: Enbridge Gas is requesting that the OEB require Enbridge Gas to file future Annual Updates by March 1 of each year.

- a) Please provide a list of all approvals Enbridge is seeking from the OEB in this proceeding.
- b) Please describe how a March 1st timing aligns with filing of other documents that related (directly or indirectly) with 5 Year Gas Supply Plan annual updates. Please include as a minimum, the following:
 - the Enbridge Asset Management Plan and Utility System Plan
 - Annual rate proceeding
 - Enbridge's proposed annual IRP filing
- c) What is the earliest date that Enbridge could complete and file its 5 Year Gas Supply Plan updates for each year?
- d) What was the impact to plan quality, if any, for Enbridge to file its 5 Year Gas Supply Plan updates by February 1, 2021?
- e) What would be the impact to plan quality, if any, for Enbridge to file the 5 Year Gas Supply Plan updates by January 15 each year?
- f) It appears that the information feeding the 5 Year Gas Supply Plan is completed the summer of the preceding year (e.g. summer of 2020 for 2021 plan). Is there anything that would restrict Enbridge from completing the Gas Supply Plan updates earlier? (Reference: "The current forecast was produced in the summer of 2020 and reflects the best information available at the time". Page 21)

Pollution Probe #2

[Section 2 – Continuous Improvement]

Reference: "Since filing EGI's 5-Year Plan, the Gas Supply department ("Gas Supply") has analyzed the existing processes, identified the best elements of each legacy process ..."

- a) Can Enbridge provide the list of process decisions that were optimized and what the resulting decisions were?
- b) Please describe the process and criteria used by Enbridge to review the existing processes and determine which legacy process was better.

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- c) Was any external stakeholder/customer input or consultation used as an input to making decisions? If yes, please describe what input was used and which decisions were impacted.
- d) What approximate number/percentage of Gas Supply processes still need to be reviewed and consolidated from the legacy utilities?
- e) Please provide a list of the Gas Supply legacy processes that are not able to be harmonized without OEB approval. For each item, please indicate when Enbridge plans to request OEB approval. [Section 3 reference].
- f) When does Enbridge propose to complete its consolidation of all Gas Supply processed from the legacy utilities?

Pollution Probe #3

[Section 2 – Continuous Improvement]

Reference: “During Q4 of 2020, EGI made a refinement to the organizational structure of the Gas Supply team.”

- a) Please provide a copy of the organization structure before and after the organizational structure improvements made in 2020.
- b) Does the Gas Supply Team conduct the avoided cost analysis for DSM? If yes, when was the last analysis conducted? If no, who conducts that analysis?
- c) Does this group do the procurement for RNG? If no, who conducts that analysis? If yes, is the same blind RFP process used for RNG and Gas Supply?
- d) Has Enbridge identified any improvements it is proposing to its Gas Supply Scorecard? If yes, please provide details.

Pollution Probe #4

[Section 3 – Integration]

Reference: “The gas supply planning process is an integrated process that begins months in advance of the upcoming gas year with multiple teams executing on numerous internal processes.”

- a) Please provide a process diagram and timeline showing the gas supply planning process and how it integrates with other related processes.

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Pollution Probe #5

[Section 3 – Integration]

Reference: “During the first two years of combining the legacy utility gas supply functions, EGI has accomplished many integration enhancements and efficiencies.”

- a) Please provide a list of the outcomes for Ratepayers related to the enhancements and efficiencies made over the past two years.
- b) Please indicate what scorecard metrics were impacted by the enhancements and efficiencies made over the past two years.

Pollution Probe #6

[Section 3 – Integration]

Reference: Gas Supply Plan Harmonization

- a) For the expenditures of more than \$2 billion on Gas Supply annually, please provide the approximate split for in-franchise and ex-franchise by dollar and percent of total (Please use the most recent year available for illustrative purposes if that is easiest).
- b) Did Enbridge harmonize the policy for interruptible rates since last year? If yes, please provide a copy of the policy chosen and explain why it was the best option.

Pollution Probe #7

[Section 4.2 – Public Policy Updates]

- a) How does Enbridge include emerging policy issues that could affect the 5 Year Gas Supply Plan? Are these at the municipal, Provincial and Federal level?
- b) Does the Gas Supply Plan include any impacts of reduced natural gas from the Ontario Environment Plan or municipal energy and emissions plans?
- c) What forecast does the Gas Supply Plan include for DSM related gas reductions over the next 5 years?
- d) When was the Low Carbon Energy Project (“LCEP”) completed and commissioned?

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- e) If an Ontario municipality in your franchise area wants to transport RNG from one of their sites (e.g. landfill or wastewater treatment plant), can they contract anyone to build that pipeline or would it have to be Enbridge?
- f) What impacts, if any, would the current Enbridge IRP Proposal have on 5 Year Gas Supply Plan if it were accepted by the OEB?

Pollution Probe #8

[Section 6.3 Sustainable Natural Gas]

- a) With Enbridge being a gas distributor rather than a natural gas producer, please explain how Equitable Origins EO100™ Certification (or equivalent) would relate to Enbridge and gas customers in Ontario.
- b) Is the Gas Supply team the Enbridge lead on assessing Sustainable Natural Gas. If not, please explain who the lead department is and how Gas Supply supports that department on SNG.
- c) Please explain whether there is a cost to purchase natural gas that is certified sustainable and how that would be the same/different from Enbridge's pilot RNG program.
- d) Please explain the difference between Energir's RNG (renewable natural gas) targets (in alignment to exceed Provincial requirement – reference: [R-6.01, r. 4.3 - Regulation respecting the quantity of renewable natural gas to be delivered by a distributor \(gouv.qc.ca\)](#)) and the SNG (sustainable natural gas) target of 20% Enbridge references on page 26 of its evidence.
- e) The web reference for footnote 46 on page 26 does not appear to work. Please file a copy of the webpage contents.

Pollution Probe #9

[Section 8.1 Procurement Process and Policy]

- a) Please provide a copy of the current Gas Supply Procurement Policies and Practices document which represent a combined group of policies and practices for both legacy utility's rate zones.

Pollution Probe #10

[Section 9.1 Heating Degree Days]

Reference: Table 20, page 52

- a) The Actual HDDs for all regions are noticeably lower from 2017/18 to 2019/20. Please provide a table showing those differences and explain the reasons for these decreases.
- b) Please provide the change in gas supply to serve Ontario customers if average temperature increases 1 degree over the current forecast.

Pollution Probe #11

[Appendix H Performance Metrics]

- a) For each scorecard metric, please explain if the target was met or missed.
- b) For each metric result that was not on target, please provide an explanation of what led to the variance.
- c) What process has Enbridge used to enhance the public policy portion of the scorecard?
- d) Has Enbridge undertaken an assessment of public policy issues (either internally or through a consultant)?
- e) Is Enbridge planning to enhance any of its scorecard metrics in 2021?