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March 31, 2021

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Christine E. Long, Registrar

Dear Ms. Long:

**Re: Low Income Energy Network (“LIEN”) - Submission
Integrated Resource Planning Proposal by Enbridge Gas Inc.
Board File No. EB-2020-0091**

Please find attached LIEN’s Submission pursuant to Procedural Order No. 9 dated March 5, 2019 in the above-noted matter.

Yours truly,

Madiha Vallani

cc: LIEN Legal Subcommittee
Matt Gardner

Document #: 1928331

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Integrated Resource Planning Proposal by
Enbridge Gas Inc.

**SUBMISSION OF
THE LOW-INCOME ENERGY NETWORK**

March 31, 2021

I. INTRODUCTION

1 The Low-Income Energy Network (“LIEN”) sets out below LIEN’s submissions in response to the Integrated Resource Planning (or “IRP”) Proposal filed by Enbridge Gas Inc. (“Enbridge”) to allow Enbridge to consider and include non-pipeline solutions or integrated resource planning alternatives (“IRPAs”) instead of natural gas facilities, where possible.

2 LIEN has reviewed Enbridge’s IRP Proposal to the Ontario Energy Board (the “OEB”), and concurs that Enbridge’s IRP Framework should include the following elements:

- (a) *Cost Effectiveness* as a guiding principle

- (b) an inclusive Stakeholder Outreach and Engagement Process that takes into account inputs from low-income energy consumers, and
- (c) comprehensive Pilot Projects.

3 LIEN's submissions below focus on the above three elements.

II. **GUIDING PRINCIPLE: COST EFFECTIVENESS**

4 LIEN concurs with Enbridge that *Cost Effectiveness* should be a guiding principle that informs and influences how Enbridge implements IRP. Enbridge submits, and LIEN agrees, that cost-effectiveness should be a guiding principle in its consideration of facility and non-facility IRPAs, and that the recommended solution should be a lesser cost for customers.¹

5 LIEN's primary objective is to ensure affordable energy for low-income residents of Ontario while encouraging sustainable and renewable energy initiatives and conservation of energy use. This has become even more important due to the Covid-19 pandemic in Ontario, which has caused increased economic pressures on lower-income Ontarians. As a result, it is essential to provide opportunities for these consumers to manage their energy bills through implementing cost-effective IRP solutions.

To ensure the least-cost option is selected to protect low-income as well as all ratepayers, it is important to ensure that there is a framework in place to measure all of the relevant costs and benefits of the pipe and non-pipe alternatives on an equal footing. E.B.O. 134 was developed more than 30 years ago and as cash flow analysis, not for this purpose. More recently, broader benefit-cost analysis has been developed

¹ Exhibit B, para 35.

to take into account more clearly the societal perspective such as the Total Resource Cost (“TRC”) and Societal Cost Test (“SCT”). Starting with a TRC plus as with the current Ontario natural gas framework for DSM or with an SCT would be more appropriate. Specifically, LIEN supports preservation of the TRC plus cost-benefit ratio of 0.70 for any DSM for low-income consumers in IRP, and re-examining the non-energy benefit adder that forms part of the TRC plus test in the context of IRP. LIEN supports the OEB leading the development of a benefit-cost analysis handbook that prescribes the type of tests to be used, their inputs, and how the tests should be applied. This will ensure pipe and non-pipe alternatives can be compared on a level footing and cover the full range of benefits and costs.

III. STAKEHOLDER OUTREACH AND ENGAGEMENT PROCESS

6 As part of its IRP Proposal, Enbridge seeks the OEB’s approval of its “proposed three-component stakeholdering process, including a purpose-specific stakeholder technical working group to support IRPA development, and to identify and discuss new IRP solutions and IRP avoided costs and benefits.”²

7 Before the OEB approves Enbridge’s proposed three-component stakeholdering process, LIEN asks the OEB to mandate consultation by Enbridge specifically with low-income stakeholders on IRP, and to make efforts to accommodate their participation throughout the three-component stakeholdering process.

8 In response to an interrogatory from LIEN and OEB Staff, Enbridge provided additional details about Enbridge’s proposed three-component approach to stakeholder

² Enbridge Gas Argument in Chief, page 14 of 50 and page 32 of 50.

engagement in IRP.³ Enbridge advised that it expects low-income customers and local low-income representative groups and associations as stakeholders to be included in engagement activities. In its interrogatory response, Enbridge also advised that engagement initiatives will be specific to relevant geo-targeted areas, and in the form of open houses, webinars, surveys, and online opportunities.

9 At the technical conference,⁴ LIEN was pleased to learn that Enbridge plans to provide low-income energy consumers with opportunities to offer input about steps within IRP processes during components 2 and 3 of Enbridge's proposed stakeholder outreach and engagement process. However, LIEN would like more details about Enbridge's method to roll out its proposed stakeholder engagement initiatives.

10 Specifically, LIEN would like to be kept informed and updated about

- (a) all stakeholder events that Enbridge will hold to gather input about IRP progress and processes,
- (b) as part of component 3, the criteria Enbridge will apply to determine if/how Enbridge will consult with low-income consumer representatives on a geographically-targeted basis, and
- (c) key learnings and insights derived from stakeholder consultation as they relate to low-income energy consumers.

³ Exhibit I.LIEN.3 PP1; Exhibit I.STAFF.9 PP 2-3.

⁴ Final Transcript for EB-2020-0091 EDI, Feb 11, 2021, page 157-159.

11 LIEN also asks the OEB to mandate consultation by Enbridge with all stakeholders in a timely and meaningful way both in the three-component stakeholdering process, and technical working group(s).

IV. IRP PILOT PROJECT PROPOSAL

12 LIEN concurs with Enbridge that comprehensive IRP pilot projects will provide valuable learnings about Enbridge's IRP proposal and IRPAs.

13 In response to an interrogatory from LIEN and OEB Staff,⁵ Enbridge indicated that Enbridge has not finalized several details of its two proposed pilot projects, including project technologies or the timeline that Enbridge would pursue for IRP pilot projects.

14 LIEN requests that the OEB urge Enbridge to situate IRP pilot projects in areas that include diverse customer types, and in particular, low-income energy consumers should be captured within the ambit of one or both of Enbridge's proposed pilot projects.

15 LIEN requests that the OEB urge Enbridge to work closely with partners such as LIEN, the Vulnerable Energy Consumers Coalition, and municipalities on the development of its pilot projects. LIEN anticipates being able to provide Enbridge with useful feedback on its delivery and future rollout of pilot projects, and would like to be kept informed of the progress of pilot projects, and details about pilot projects, as they become finalized.

16 Specifically, LIEN would like to be kept informed and updated about the following: project design, measures/activities, budget, geographic areas targeted, and

⁵ Exhibit I.LIEN.1 PP 1; Exhibit I.STAFF.12 PP.2.

Enbridge's proposed stakeholder sessions that will inform the development of IRP pilot projects.

V. **CONCLUSIONS**

LIEN requests the OEB to

- (a) approve *Cost Effectiveness* as a guiding principle to inform and influence how Enbridge implements IRP
- (b) use either an SCT or a TRC plus test as the starting point for comparing pipe and non-pipe alternatives on an equal footing. The OEB should lead the preparation of a comprehensive benefit-cost handbook that prescribes the tests to be used, the inputs to the tests and how they should be applied
- (c) mandate consultation by Enbridge specifically with low-income stakeholders on IRP, and to make efforts to accommodate their participation throughout the three-component stakeholdering process
- (d) mandate consultation by Enbridge with all stakeholders in a timely and meaningful way both in the three-component stakeholdering process, and technical working group(s)
- (e) urge Enbridge to situate IRP pilot projects in areas that include diverse customer types; in particular, low-income energy consumers should be captured within the ambit of one or both of Enbridge's proposed pilot projects, and

- (f) request that Enbridge inform and update intervenors about pilot project design, measures/activities, budget, geographic areas targeted, and Enbridge's proposed stakeholder sessions that will inform the development of IRP pilot projects.

Document #: 1927399