



**BY EMAIL and RESS**

**Mark Rubenstein**  
mark@shepherdrubenstein.com  
Dir. 647-483-0113

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

May 11, 2021  
Our File: EB20210004

**Attn: Christine Long, Registrar**

Dear Ms. Long:

**Re: EB-2021-0004 – 2021 Annual Gas Supply Plan Update – Comments**

We are counsel to the School Energy Coalition (“SEC”). These are SEC’s brief comments on Enbridge Gas Inc.’s (“Enbridge”) 2021 Annual Update to its Gas Supply Plan (the “Annual Update”).

As we noted in our comments on the review of Enbridge’s 5-year Gas Supply Plan, it is not possible to properly assess the plan, or its Annual Update, outside the context of an application for approval of the cost consequences of specific gas supply decisions. Thus, while SEC may take no issue with most of the high-level analysis described in the Annual Update, that should not be construed as acceptance of the eventual outcome of the plan or that the resulting cost consequences are reasonable. Notwithstanding this view, SEC does wish to note that it did find the Stakeholder Conference helpful in attempting to facilitate a better understanding of Enbridge’s gas supply planning process and the considerations that expected to arise over the next year.

SEC does wish to raise one specific issue. In the Annual Update, Enbridge notes that it is considering adding what it calls Sustainable Natural Gas (“SNG”) to its supply mix.<sup>1</sup> The name SNG is a misnomer as it is not a sustainable decarbonized fuel source such as renewable natural gas. SNG simply means that the producer may be certified by some third-party entity that its extraction techniques meet certain environmental, social & governance (“ESG”) practices.<sup>2</sup> SEC submits Enbridge should not use call this sourced has SNG as it sends a misleading message to customers about the attributes of this type of supply.<sup>3</sup>

SEC is also concerned regarding the lack of information regarding the procurement method and cost differential regarding this new source of supply.<sup>4</sup> Enbridge should be required to bring forward a comprehensive proposal for review by parties and the Board before any cost consequences are to be

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<sup>1</sup> 2021 Annual Update to 5 Year Gas Supply Plan, p.25-26

<sup>2</sup> *Ibid.*; Tr.1, p.90-94

<sup>3</sup> In fairness to Enbridge, it has recognized the potential need for a more accurate name (Tr. 1, p.93).

<sup>4</sup> Tr.1, p.98-99



approved. A quarterly QRAM proceeding is not the appropriate venue as the process is meant to be largely a mechanistic update and not an in-depth review. SEC recommends this review take place in the context of one of its other regular applications to the Board (e.g. annual rate case, DVA disposition proceeding, etc.).

Yours very truly,  
**Shepherd Rubenstein P.C.**

Mark Rubenstein

cc: Ted Doherty, SEC (by email)  
EGI and interested parties (by email)