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File No. 339583.000282

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DELIVERED BY EMAIL
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Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, Suite 2701
Toronto, ON M4P 1E4

Dear Ms. Long

**Re: Enbridge Gas Inc. ("EGI")
Review of Five-Year Gas Supply Plan
Board File No. EB-2021-0004**

Pursuant to the April 13-14 Stakeholder Conference, we submit the following comments on behalf of our client, Canadian Manufacturers & Exporters (CME).

According to EGI's evidence, it is "investigating (sustainable natural gas) ("SNG") frameworks and exploring opportunities for the potential inclusion of SNG within its system supply portfolio as early as November 1, 2021.¹ SNG would cost more than the traditional natural gas sourced by EGI.²

With respect to SNG, CME has two comments. First, CME agrees with EGI and others that the use of the term "sustainable natural gas" is potentially confusing, as it sounds similar to renewable natural gas. Accordingly, CME submits that EGI should not use the "sustainable natural gas" and it should instead use "certified natural gas" or some other name that eliminates potential confusion.

Second, given that EGI's evidence is that sustainable or certified natural gas will cost ratepayers a premium, CME submits that EGI should only be allowed to recover additional amounts from ratepayers on demonstrating that ratepayers are deriving a benefit that justifies such a premium.

With respect to the cost consequences of the gas supply plan, EGI has indicated that those consequences should not be reviewed as part of this proceeding, but should be reviewed within the confines of other, existing applications such as EGI's QRAM application. CME takes no issue with EGI's contention that the cost consequences of the gas supply plan are outside of the confines of this

¹ EB-2021-0004, 2021 Annual Gas Supply Plan, p. 26.

² EB-2021-0004, 2021 Annual Gas Supply Plan, p. 26.

proceeding. However, CME submits that the QRAM proceeding is not an appropriate place to review gas supply plan cost consequences, as it is meant to be mechanistic, and the review completed within approximately a one week period. Accordingly, CME submits that the review of the gas supply cost consequences should take place within other, more robust applications such as an annual rate case.

Yours very truly



Scott Pollock

- c. Alex Greco (CME)
- Khalil Virenay (OEB)
- Michael Millar (OEB)
- All Parties in EB-2021-0004

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