



150 Ferrand Drive, Suite 208
Toronto, Ontario M3C 3E5
T 416.926.1907 F 416.926.1601
www.pollutionprobe.org

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

June 28, 2021

**Re: EB-2021-0146 Consultation to Review 2021 Annual Update to Five-Year Natural Gas Supply Plans
EPCOR Natural Gas Limited Partnership (Aylmer and Southern Bruce)
Pollution Probe Interrogatories to EGNLP**

Dear Ms. Long:

In accordance with the OEB notice dated May 18, 2021 for the above-noted proceeding, please find attached a copy of Pollution Probe's Interrogatories to EPCOR Natural Gas Limited Partnership (EGNLP).

Respectfully submitted on behalf of Pollution Probe.

Michael Brophy, P.Eng., M.Eng., MBA
Michael Brophy Consulting Inc.
Consultant to Pollution Probe
Phone: 647-330-1217
Email: Michael.brophy@rogers.com

cc: EGNLP Regulatory (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

**Consultation to Review the 2021 Annual Update for the Natural Gas Supply Plans
EPCOR Natural Gas Limited Partnership (Aylmer and Southern Bruce)**

POLLUTION PROBE INTERROGATORIES

June 28, 2021

**Submitted by: Michael Brophy
Michael Brophy Consulting Inc.
Michael.brophy@rogers.com
Phone: 647-330-1217
28 Macnaughton Road
Toronto, Ontario M4G 3H4**

Consultant for Pollution Probe

A) Questions related to the EGNLP Aylmer Annual Update to Gas Supply Plan

Pollution Probe #A1

Reference: EGNLP indicates that there are “No significant changes were introduced this past year to Aylmer’s Supply Plan.”

- a) Have any adjustments been made to the Gas Supply Plan due to COVID related impacts. If yes, please provide details. If no, please explain the data supporting no COVID related impacts.
- b) Are any adjustments expected due to the DSM programs proposed to be launched in 2021 or 2022?

Pollution Probe #A2

Reference: Section 3.1.9 Diversity of Supply

- a) Please explain the factors that led to the downward historical trend of supply from Enbridge of 94.5% in 2016 to 67.3% in 2020.
- b) Please explain the factors that are leading to the upward trend of supply from Enbridge of 69.3% in 2021 to 74.5% in 2025.

Pollution Probe #A3

Reference: Section 6.1 RNG

- a) Please describe what activity (including discussions with municipalities) EGNLP has undertaken or plans to undertake to assess development of RNG opportunities.
- b) Please explain EGNLP’s understanding of the scale of opportunity for RNG in Ontario compared to traditional natural gas. Please provide any studies or reports that support this understanding.
- c) What volume (m³ or GJ) of RNG does EGNLP forecast to be available to Ontario gas consumers for the next 5, 10 and 20 years? Please also provide this as a percentage of gas supply.

- d) In EGNL's view, is RNG likely to have a material (volume or decarbonization) impact in Ontario to the natural gas grid in the future? Please explain.
- e) If a municipality wanted to capture RNG from its operations (e.g. landfill or wastewater treatment plant) for its own use or injection into the EGNLP system, please explain the process and timing that would need to occur.
- f) Is EGNLP able to provide RNG assistance (capture or private pipeline) to municipalities that are in an Enbridge franchise area for collection of RNG and use in their operations (e.g. private pipeline and not injecting into the Enbridge system)? If not, why not?
- g) Please explain what ENGLP specifically plans to do to support the RNG policy outcomes over the next 5 years.

Pollution Probe #A4

Reference: Section 6.2 DSM

- a) Please explain what reports, analysis or other activity EGNLP has undertaken in support of providing DSM programs to its customers.
- b) Please provide specific details and status of the commercial DSM pilot expected to be rolled out in 2021 or 2022.
- c) Please explain why the commercial DSM pilot is the only program proposed to be launched in 2021 or 2022.

Pollution Probe #A5

Reference: Section 6.2 DSM

- a) DSM programs have been available in Ontario for over 30 years. Please explain why a pilot is needed for such an established set of programs.
- b) Has EGNLP discussed opportunities to partner with IESO, local electric utilities or other delivery agents to deliver cost-effective joint energy efficiency programs. If not, why not.

- c) A significant amount (\$ billions) of energy reduction incentives are currently available through various levels of government and other sources that EGNLP customers could have access to today. Please explain if EGNLP has made customers aware of these programs and incentives and if not, why not.
- d) Please explain how the proposed EGNLP DSM programs will be complimentary to the existing programs and incentives mentioned above, rather than duplicative.
- e) Does EGNLP prefer to insource or outsource its proposed DSM programs? Please explain the answer.

Pollution Probe #A6

Reference: Section 6.2 DSM

Reference: Currently, the OEB is considering a multi-year DSM Framework (EB-2021-0002) specific to Enbridge rather than its traditional approach of a generic DSM Framework applicable to all Ontario Natural Gas utilities.

- a) Please explain what the impacts will be to EGNLP going forward if the OEB moves from a generic DSM Framework to one specific to Enbridge.
- b) Is EGNLP willing to accept the proposed DSM Framework filed in EB-2021-0002 by Enbridge for use by EGNLP? If not, why not?
- c) Was EGNLP consulted on the proposed changes to the OEB's DSM Framework? If yes, please provide a summary of the consultation.

Pollution Probe #A7

Reference: Section 6.3 Community Expansion

- a) Please provide a summary of the impacts to EGNLP from the recently announced funding to provide natural gas to new Ontario communities and how this needs to be incorporated into the Five Year Gas Supply Plan.
- b) Do Tables 2.1 and 2.2 include the forecasted additions as a result of the recent Provincial grant program referenced above?

Pollution Probe #A8

Reference: Section 9 Continuous Improvement

Please identify what continuous improvement has been identified since the last OEB review of the Five Year Gas Supply Plan. Please explain the impacts of implementing these continuous improvement activities.

Pollution Probe #A9

Reference: The ENGLP Aylmer Gas Supply Plan identifies four elements that align with the Public Policy requirement, specifically the Federal Carbon Pricing Program, Renewable Natural Gas (RNG), Demand Side Management (DSM) and Community Expansion,

- a) Please provide a comprehensive list of public policies that were reviewed as the Gas Supply Plan Annual update was developed.
- b) Please explain if any of the following policy considerations were considered and if so, please explain how they impacted the plan update.
 - Government of Ontario's Made-in-Ontario Environment Plan (MOEP)
 - Ontario's Natural Gas Expansion policy and program
 - Municipal Energy and Emissions Plans
 - Climate policy

Pollution Probe A10

Reference: Appendix F - EGNLP Aylmer Performance Metrics Scorecard

- a) Several metrics in the scorecard have a 2020 result noted as "C", which Pollution Probe has interpreted as "Complete". For each metric with a result listed as "C", please provide details to help understand the outcome achieved and if it would be considered a poor outcome, adequate outcome or good outcome.
- b) The scorecard indicates "N/A" for the RNG and DSM metrics. Please explain if the target was to do nothing for these metrics or if there was a goal that was not met in 2020.
- c) Please explain the purpose of including metrics in a scorecard where the results can be "N/A".

- d) Does EGNLP use this scorecard to manage its business (e.g. on a monthly or quarterly basis) or is it purely for OEB reporting?
- e) Has EGNLP assessed opportunities to make improvements to its scorecard? If yes, please provide details of the assessment and the outcome.

B) Questions related to the EPCOR Southern Bruce Gas Supply Plan 2020-2023

Pollution Probe #B1

Reference: Section 8.1 Community Expansion

- a) Please provide a summary of the impacts on EPCOR for the recently announced funding to expand natural gas to Ontario communities and how this is incorporated into the Gas Supply Plan.
- b) Please explain how the Provincial grant program will impact community expansion.
- c) Does Table 3.2 include the forecasted impacts of expansion?

Pollution Probe #B2

Reference: Section 8.3 DSM

- a) Please explain what reports, analysis or other activity EPCOR has undertaken in support of providing future DSM programs to its customers.
- d) Please provide specific details and status of the commercial DSM pilot expected to be rolled out in 2021 or 2022.
- e) Please explain why a commercial DSM pilot is the only program proposed to be launched in 2021 or 2022.

Pollution Probe #B3

Reference: Section 8.3 DSM

- a) DSM programs have been available in Ontario for over 30 years. Please explain why a pilot is needed for such an established set of programs.
- b) Has EPCOR discussed opportunities to partner with IESO or local electric utilities to deliver cost-effective joint energy efficiency programs? If not, why not.

- c) A significant amount (\$ billions) of energy reduction incentives are currently available through various levels of government and other sources that EPCOR customers could have access to today. Please explain if EPCOR has made customers aware of these programs and incentives and if not, why not.
- d) Please explain how the proposed EPCOR DSM programs will be complimentary to the existing programs and incentives mentioned above, rather than duplicative.
- e) Does EPCOR prefer to insource or outsource its proposed DSM programs? Please explain the answer.

Pollution Probe #B4

Reference: Section 8.3 DSM

Reference: Currently, the OEB is considering a multi-year DSM Framework (EB-2021-0002) specific to Enbridge rather than the traditional approach of a DSM Framework applicable to all Ontario Natural Gas utilities.

- a) Please explain what the impacts will be to EPCOR going forward if the OEB moves from a generic DSM Framework to one specific to Enbridge.
- b) Is EPCOR willing to accept the proposed DSM Framework filed in EB-2021-0002 by Enbridge for use by EGNLP? If not, why not?
- c) Was EPCOR consulted on the proposed changes to the OEB's DSM Framework? If yes, please provide a summary of the consultation.

Pollution Probe #B5

Reference: Section 8.4 RNG

- a) Please describe what activity (including discussions with municipalities) EPCOR has undertaken or plans to undertake to assess development of RNG opportunities.
- b) Please explain EPCOR's understanding of how much opportunity there is for RNG in Ontario compared to traditional natural gas. Please provide any studies or reports that support this understanding.
- c) What volume of RNG does EPCOR forecast to be available to Ontario gas consumers for the next 5, 10 and 20 years? Please also provide this as a percentage of gas supply.
- d) In EPCOR's view, is RNG likely to have a material (volume or decarbonization) impact in Ontario to the natural gas grid in the future? Please explain.
- e) If a municipality wanted to capture RNG from its operations (e.g. landfill or wastewater treatment plant) for its own use or injection into the EPCOR system, please explain the process and timing that would need to occur.
- f) Is EPCOR able to provide RNG assistance to municipalities that are in an Enbridge franchise area for collection of RNG and use in their operations (e.g. private pipeline and not injecting into the Enbridge system)? If not, why not?
- g) Please explain what EPCOR specifically plans to do to support the RNG policy outcomes in the future.

Pollution Probe #B6

Reference: The EPCOR South Bruce Gas Supply Plan identifies four elements that align with the Public Policy requirement, specifically the Federal Carbon Pricing Program, Renewable Natural Gas (RNG), Demand Side Management (DSM) and Community Expansion,

- a) Please provide a comprehensive list of public policy objectives that were reviewed as the Gas Supply Plan Annual update was developed.
- b) Please explain if any of the following policies were considered and if so, please explain how they impacted the plan update.
 - Government of Ontario's Made-in-Ontario Environment Plan (MOEP)
 - Municipal Energy and Emissions Plans
 - Ontario's Natural Gas Expansion policy and program
 - Climate policy

Pollution Probe #B7

Reference: Appendix E - Southern Bruce County Lagging Conversion Survey

- a) What impact if any does climate change have on potential customer decisions to convert to natural gas?
- b) Enbridge applied to the OEB in EB-2020-0091 for the ability to use non-pipeline alternatives (e.g. geothermal) when cost-effective to reduce the need for additional gas infrastructure. Would EGNLP be interested in a similar proposal if the OEB allows it to be included in rate base?

Pollution Probe B8

Reference: Appendix F - EPCOR South Bruce Performance Scorecard

- a) Several metrics in the scorecard have a 2020 result noted as "C", which Pollution Probe has interpreted as "Complete". For each metric with a result listed as "C", please provide details to help understand the outcome achieved and if it would be considered a poor outcome, adequate outcome or good outcome.
- b) The scorecard indicates "N/A" for the RNG and DSM metrics. Please explain if the target was to do nothing for these metrics or if there was a goal that was not met in 2020.

- c) Please explain the purpose of including metrics in a scorecard where the results are “N/A”.
- d) Does EPCOR use this scorecard to manage its business (e.g. on a monthly or quarterly basis) or is it purely for OEB reporting?
- e) Has EPCOR assessed opportunities to make improvements to its scorecard? If yes, please provide details of the assessment and the outcome.