



July 12, 2021

VIA RESS

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

Dear Ms. Long,

Re: Enbridge Gas Inc.
Application for Multi-Year Gas Demand Side Management Plan (2022 to 2027)
Board File No.: EB-2021-0002 (the Proceeding)

We are counsel to the Association of Power Producers of Ontario (**APPrO**) in the Proceeding and file these submissions on Board Staff's Draft Issues List (the **Draft Issues List**) in accordance with Procedural Order No. 2.

APPrO respectfully requests that the Board ensure that the members APPrO represents have, and can exercise, their right to be heard in this Proceeding through the inclusion of revised (in blackline) draft issue 8(e):

Issue 8(e):

...

e. Are Enbridge Gas's proposed offerings for large volume customers, including gas-fired generators (GFGs), appropriate and do they account for the numerous and overlapping climate change, emissions reduction and low-carbon fuels policies and programs that already apply to GFGs?

Overlapping carbon-related charges and costs. APPrO submits that large volume customers, including GFGs, are already burdened (and may be further burdened in the future) with numerous overlapping climate change, greenhouse gas emissions reduction, and low-carbon fuels policies and programs in Ontario, including, without limitation, the carbon charge and output-based pricing systems under the federal *Greenhouse Gas Pollution Pricing Act*; the provincial Emissions Performance Standards Regulation (Ontario Regulation 241/19); performance standards under the federal *Regulations Limiting Carbon Dioxide Emissions from Natural Gas-fired Generation of Electricity* under the *Canadian Environmental Protection Act, 1999*; the Clean Fuel Standard (**CFS**) anticipated to come into force on December 1, 2022, applying to liquid fossil fuels; the *Access to Natural Gas Act, 2018* and Ontario Regulation 24/19, each providing additional opportunities for natural gas distributors to implement DSM measures for customers that do not have numerous pancaked and overlapping climate- and energy efficiency-related costs all

intended to effect the same outcome; and President Biden's announced goal of 100 percent carbon pollution-free electricity by 2035,¹ which may impact energy imports into Ontario from the United States. APPrO submits that the above indicates that the electricity sector and clean, natural gas-fired electricity generators therein, are increasingly subject to more and multiple carbon-related costs than any other sector in the Ontario and Canadian economy. These costs should be considered in Enbridge Gas's DSM program offerings and the Proceeding.

APPrO therefore requests that the Board ensure that the revised draft issues 8(e) is included in the final Issues List for this Proceeding.

Sincerely,



Lisa (Elisabeth) DeMarco

- c. Asha Patel, Enbridge Gas Inc.
Dennis O'Leary, Aird & Berlis LLP
David Butters, APPrO

¹ The White House, "Fact Sheet: President Biden Sets 2030 Greenhouse Gas Pollution Reduction Target Aimed at Creating Good-Paying Union Jobs and Securing U.S. Leadership on Clean Energy Technologies." (22 April 2021) available online: <<https://www.whitehouse.gov/briefing-room/statements-releases/2021/04/22/fact-sheet-president-biden-sets-2030-greenhouse-gas-pollution-reduction-target-aimed-at-creating-good-paying-union-jobs-and-securing-u-s-leadership-on-clean-energy-technologies/>>.