

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

August 18, 2021

**Re: EB-2021-0147 EGI 2022 Rates  
Pollution Probe Interrogatories to Enbridge**

Dear Ms. Long:

In accordance with Procedural Order No. 1 dated August 9, 2021, please find attached Pollution Probe's interrogatories to the applicant.

Respectfully submitted on behalf of Pollution Probe.



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cc: Mark Kitchen, Enbridge Regulatory (via email)  
David Stevens, Aird & Berlis (via email)  
All Parties (via email)  
Richard Carlson, Pollution Probe (via e-mail)

**ONTARIO ENERGY BOARD**

**Enbridge 2022 Rates**

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**POLLUTION PROBE INTERROGATORIES**

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**August 18, 2021**

**Submitted by: Michael Brophy**  
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**Consultant for Pollution Probe**

Pollution Probe #1

[Ex. A, T2, Sch. 1]

- a) Please provide a list of which Ontario municipalities served by Enbridge were consulted prior to filing the 2022 Rates application.
- b) For each municipality consulted, please provide a summary of their input and how it was considered or included.

Pollution Probe #2

[Ex. B, T1, Sch.1]

Enbridge Gas proposes to maintain the 2021 DSM budget of \$67.8 million for the EGD rate zone and \$64.3 million for the Union rate zones in 2022 rates. The aggregate of these two amounts is \$132.1 million.

- a) Please explain why Enbridge choose to rollover the 2021 DSM budget as a placeholder in the 2022 Rates application rather than use its proposed 2022 DSM budget.
- b) Please confirm that the 2022 DSM budget of \$132 million is merely a placeholder and that the actual 2022 DSM budget determined by the OEB will be the final 2022 DSM budget.
- c) Please describe the approach proposed to true up between the 2022 DSM budget amount in this application and the actual 2022 DSM budget amount determined by the OEB.
- d) Please identify any approvals requested in the 2022 Rate proceeding would set a precedent for any decision in the EB-2021-0002 (DSM) proceeding.

Pollution Probe #3

[Ex. B, T1, Sch.1]

LRAM volumetric adjustments include the expected natural gas savings that are partially effective in the 2022 program year.

- a) Please provide a table by rate class of the fully allocated and partially allocated DSM volumes saving assumptions have been applied to 2022 rates in this application.

Pollution Probe #4

[Ex. B, T1, Sch. 1]

- a) Please provide a list of 2022 requirements from the EB-2020-0091 (IRP) Decision that Enbridge will need to implement.
- b) For each item referenced above, please provide an estimate completion date and cost.

Pollution Probe #5

[Ex. B, T1, Sch. 1, Appendix C]

- a) Please provide a summary of the costs proposed to be included in the COVID-19 Emergency Deferral Account.
- b) Please provide a summary of the savings (activity and amount) that Enbridge was able to achieve to offset incremental costs to be claimed in the COVID-19 Emergency Deferral Account.

Pollution Probe #6

[Ex. B, T1, Sch. 2 ]

Reference:

Enbridge Gas has assessed the alternatives to reduce or eliminate the PDO as described above in response to the 2021 Rates settlement proposal . Infrastructure alternatives are more costly than the current PDCI cost. Market-based alternatives are slightly less costly than the current PDCI alternative but does not provide sufficient capacity to provide a full reduction of the PDO. At this time, Enbridge Gas has not acted on or reflected the lower cost market-based alternative in this application. In order to pursue the market based alternative Enbridge seeks direction from the OEB to secure the offered firm exchange capacity.

- a) Please explain why Enbridge did not assess the full set of IRP options when assessing the options of PDO vs. infrastructure alternatives.
- b) With the issuance of the OEB Decision for EB-2020-0091 (IRP), please provide a list of potential IRP options that Enbridge believes could be considered in the future.
- c) Is it possible that other IRP alternatives could be more cost effective? If not, please explain.

Pollution Probe #7

[PollutionProbe\_IR\_AppendixA\_TorontoRNG\_20210818]

- a) Please explain if the RNG project described in Appendix A will paid for from the voluntary RNG program approved by the OEB.
- b) What impacts (if any) will the RNG project described in Appendix A have on 2022 rates?
- c) Please describe how the City of Toronto receives compensation for RNG injected in to the Enbridge natural gas grid.
- d) Will the RNG from the City of Toronto project be used to serve Ontario natural gas customers. Please explain.