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VIA EMAIL and RESS

September 9, 2021

Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario, M4P 1E4

Dear Christine Long:

**Re: Enbridge Gas Inc. (“Enbridge Gas”)
Ontario Energy Board (“OEB”) File No.: EB-2020-0091
Integrated Resource Planning Proposal – Objections to Cost Claims**

Pursuant to the Ontario Energy Board’s (“OEB”) Decision and Order dated July 22, 2021, Enbridge Gas is filing this objection to cost claims for the Integrated Resource Planning Proposal as detailed herein. Enbridge Gas received cost claims for the Integrated Resource Planning Proposal proceeding from the following parties:

- Anwaatin Inc. (“Anwaatin”);
- Association of Power Producers of Ontario (“APPRO”);
- Building Owners and Managers Association, Greater Toronto (“BOMA”);
- Canadian Manufacturers & Exporters (“CME”);
- Consumers Council of Canada (“CCC”);
- Energy Probe;
- Environmental Defence (“ED”);
- Federation of Rental-housing Providers of Ontario (“FRPO”);
- Green Energy Coalition (“GEC”);
- Industrial Gas Users Association (“IGUA”);
- Low-Income Energy Network (“LIEN”);
- London Property Management Association (“LPMA”);
- Ontario Greenhouse Vegetable Growers (“OGVG”);
- Ontario Sustainable Energy Association (“OSEA”);
- Pollution Probe (“PP”);
- School Energy Coalition (SEC); and
- Vulnerable Energy Consumers Coalition (“VECC”).

Enbridge Gas has reviewed the cost claims filed by parties and has prepared a table summarizing the cost claims, including the number of hours spent and the total cost claim for each party. The table is found at Appendix A to this letter. Based on its review of the amounts claimed, and the details supporting each cost claim, Enbridge Gas

recommends that the OEB consider the points set out below when reviewing the cost claims made by FRPO, GEC, PP and SEC, respectively.

FRPO

On August 26, 2021 FRPO filed a cost claim totaling \$109,633, more than two times higher than the average of all other cost claims, and more than three times higher than the average of cost claims when excluding the claims of FRPO, GEC, PP and SEC.

On August 5, 2020, pursuant to Procedural Order (“P.O.”) No. 3, FRPO filed a letter indicating its intent to file evidence in this proceeding. FRPO proposed that Mr. Quinn and Mr. Thompson would co-author the evidence, and that the evidence would focus on market and flow dynamics in Ontario and the opportunity to make use of supply-side solutions as part of IRP. In this letter, FRPO also included an estimate of 70 hours for Mr. Quinn (totaling \$23,000) and 30 hours for Mr. Thompson (totaling \$10,000) for a combined total cost of 40 hours or \$33,000. In P.O. No. 5 dated September 15, 2020, the OEB denied FRPO’s request to file its proposed evidence. Despite this fact, FRPO has claimed hours for both Mr. Quinn and Mr. Thompson for all aspects of the proceeding.

FRPO’s cost claim includes consultant work totaling 294 hours (including 98 hours for Mr. Thompson). This is more than twice the average number of hours claimed by other parties (and around three times the average number of hours of parties other than FRPO, GEC, PP and SEC).

Despite the OEB defined scope established in P.O. No. 2 and reiterated in the denial of FRPO’s proposed evidence,¹ FRPO focused much of its interrogatories, presentation and cross-examination on evaluation of specific supply-side Integrated Resource Planning (“IRP”) alternatives (“IRPAs”) that did little to assist the OEB in establishing an IRP policy framework for Enbridge Gas given that the OEB had already acknowledged that consideration of supply-side alternatives can be pertinent to IRP generally.²

The OEB should consider the amount of FRPO’s total claim compared to the cost claims made by other intervenors and in relation to the unique and incremental value FRPO added to the proceeding.

GEC

On July 27, 2021, GEC filed a cost claim for its own costs and the costs of its expert (EFG/Chris Neme). The costs for GEC and the Energy Futures Group (“EFG”) in GEC’s cost claim totaled \$160,498 (including \$81,593 for EFG). The cost claim is based on 212 hours spent by GEC counsel, and 247 hours spent by EFG’s representative.

¹ EB-2020-0091, Procedural Order No. 5, September 15, 2020, p.4, “The September 3, 2020 letter from FRPO provided more background on why the consideration of supply-side alternatives is important to IRP but did little to clarify the nature of the evidence and specific deliverables that Mr. Quinn proposes to prepare on behalf of FRPO, and how it will assist in the OEB’s determination of the IRP framework.” And “The OEB concludes that the concerns of FRPO can be addressed by putting to Enbridge Gas proposals for evaluation criteria for supply-side alternatives, and suggestions for the timing to assess these alternatives, through the interrogatory process.”

² EB-2020-0091, Procedural Order No. 4, August 20, 2020, p. 4.

On August 5, 2020 GEC filed a letter, pursuant to P.O No. 3 indicating that the total cost for the evidence and testimony proposed by EFG was estimated at 154 hours or \$46,980 plus an additional estimate of \$7,500 for GEC and ED Counsel. In its cost claim, GEC provides some explanation for a portion of the substantial increase in costs for EFG from the originally filed estimate.

While Enbridge Gas accepts that the scope of EFG's participation expanded beyond what was initially contemplated, the actual amounts claimed by GEC are quite high compared to other parties and compared to the initial EFG cost estimate. Enbridge Gas notes that the cost claim for GEC (excluding the claim for EFG) is around twice as much as the average of all other cost claims. Enbridge Gas further notes that the EFG claim alone is \$34,613 higher than the estimate filed on August 5, 2020.

The OEB should consider the amount of GEC's total claim compared to the cost claims made by other intervenors and in relation to the unique and incremental value GEC added to the proceeding, especially relative to their original estimates.

PP

On August 13, 2021 PP filed a cost claim totaling \$78,775, around two and a half times higher than the average of cost claims when excluding the claims of FRPO, GEC, PP and SEC. The number of hours claimed by PP is around twice the average number of hours of parties other than FRPO, GEC, PP and SEC. Even when the cost claims of all parties (including FRPO, GEC, PP and SEC) are considered together, PP's total hours and costs are almost twice as high as the average.

Pollution Probe claimed over 48 hours for interrogatories (the third highest such claim in this proceeding) despite only having filed 12 interrogatories. Pollution Probe also claimed the highest amount of hours (93 hours) for Oral Hearing preparation and attendance.

The OEB should consider the amount of Pollution Probe's total claim compared to the cost claims made by other intervenors and in relation to the unique and incremental value PP added to the proceeding.

SEC

On August 27, 2021 SEC filed a cost claim totaling \$76,929, around two and a half times higher than the average of cost claims when excluding the claims of FRPO, GEC, PP and SEC. The number of hours claimed by SEC is around twice the average number of hours of parties other than FRPO, GEC, PP and SEC. Even when the cost claims of all parties (including FRPO, GEC, PP and SEC) are considered together, SEC's total hours and costs are almost twice as high as the average.

SEC declined to file interrogatories for this proceeding, while still claiming almost two times the average hours claimed for interrogatories compared to other Intervenor. While Enbridge Gas appreciates any effort to increase regulatory efficiency and eliminate redundancy from the interrogatory process, it is exceptional that SEC would claim almost twice the average hours spent by other intervenors on interrogatories in order to avoid filing any of its own.

The OEB should consider the amount of SEC's total claim compared to the cost claims made by other intervenors and in relation to the unique and incremental value SEC added to the proceeding.

If you have any questions, please contact the undersigned.

Sincerely,

Adam Stiers
Manager, Regulatory Applications – Leave to Construct

Appendix A – Summary of Intervenor Cost Claims

| Intervenor | Total # Hours | Total Cost Claim (\$ incl. tax) |
|--|----------------------|--|
| Anwaatin | 162 | 42,628 |
| APPrO | 72 | 17,474 |
| BOMA | 120 | 35,718 |
| CME | 89 | 17,154 |
| CCC | 78 | 29,000 |
| Energy Probe | 113 | 39,373 |
| ED | 125 | 35,940 |
| FRPO | 294 | 109,633 |
| GEC | 212 | 78,905 ³ |
| IGUA | 127 | 47,009 |
| LIEN | 81 | 16,567 |
| LPMA | 90 | 33,374 |
| OGVG | 88 | 28,772 |
| OSEA | 130 | 32,871 |
| PP | 211 | 78,775 |
| SEC | 206 | 76,929 |
| VECC | 96 | 32,842 |
| Average | 135 | 42,129 |
| Average excluding top four (FRPO, GEC, PP, SEC) | 104 | 31,440 |

³ GEC also claims \$81,592 (247 hours) for the evidence and work from EFG (Chris Neme).