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Enbridge Gas Inc.
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October 26, 2021

VIA EMAIL

Christine Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Christine Long:

**Re: EB-2021-0183 – Green Button Implementation
Draft OEB Staff Guidance and Notice of Proposal to Amend the Retail
Settlement Code
Enbridge Gas Inc. – Written Comments**

In accordance with the Ontario Energy Board's ("OEB") letter dated October 12, 2021, the following are Enbridge Gas Inc.'s ("Enbridge Gas") written comments on the Draft OEB Staff Guidance regarding the Green Button Implementation. Additionally, on October 12, 2021, the OEB issued a Notice of Proposal to Amend the Retail Settlement Code to which Enbridge Gas has no comment.

Approach to Green Button Implementation

Enbridge Gas appreciates having the opportunity to participate in the Green Button Task Force and supports the OEB's initiative to have an industry-led Green Button implementation working group ("industry-led working group").

Enbridge Gas agrees that having an industry-led working group will help gain clarity on implementation matters / considerations, so distributors can follow a consistent approach in implementing Green Button.

Enbridge Gas would like to understand future reporting requirements that may be implemented and would like the opportunity to provide input into the performance measures and how metrics are determined through the industry-led working group.

Establishment of an Industry-led Implementation Working Group

The OEB staff invited expressions of interest in participating on an industry-led working group, and Enbridge Gas is interested in participating. Following are Enbridge Gas's proposed team members to be included:

- Tracy Lynch - Director, Customer Care Operations
Email: tracy.lynch@enbridge.com
- Donna Cheung – Manager, Digital Channels and Analytics
Email: donna.cheung@enbridge.com
- Chris Toman – Manager, TIS Business Relationship
Email: chris.toman@enbridge.com)
- Unni Krishnan – Specialist, TIS Systems Analysis
Email: unni.krishnan@enbridge.com

Please include Regulatory Affairs, EGIRegulatoryAffairs@enbridge.com on the distribution list for this proceeding.

Reporting on Implementation Progress

Enbridge Gas agrees with the OEB's plan to implement quarterly progress reviews commencing on January 31, 2022. Enbridge Gas would look to provide progress updates on implementation and share any challenges that may develop.

Deferral Account

Enbridge Gas notes that the OEB has approved the establishment of a deferral account for Green Button and puts forward that the OEB should allow both capital and O&M costs to be recovered. Enbridge Gas will file an accounting order as required to recover deferred costs.

Appendix A – Draft OEB Staff Guidance Regarding Implementation of Green Button Energy Data to be Made Available

In the implementation of Green Button, Enbridge Gas will provide energy data as currently available. For historical data, Enbridge Gas is seeking a consistent approach in the amount of data to provide. This can be discussed and worked through in the industry-led working group.

Table 2: Energy Usage and Account Information: Natural Gas

As an outcome of the industry-led working group, Enbridge Gas would like some additional clarity on Energy Data that would be shared with third parties. For example, Vendor Supply information, which would include competitive pricing information, could be used for matters not contemplated by the Green Button Regulation.

Process for Customer Authorization and Revocation of Third-Party Access

As an outcome of the industry-led working group, Enbridge Gas would like some additional clarity on Customer Authorization and Revocation of Third-Party Access. For example:

- What is meant by authentication?
- How will Green Button ensure customer data is protected throughout the end-to-end process (e.g., from the distributor to the third party to data destruction)?
- Who will be responsible for third party governance?
- What are the terms of agreement between the distributor and third party, if any?
- What are the distributor's rights to disallow third party access due to risk assessment? (e.g., cyber security risk)

Enbridge Gas agrees informed consent is vital in the Customer Authorization process as Enbridge Gas has no ability to actively monitor for any issues that may arise for the customer or the third parties.

Termination by Distributor of Authorization of Third Party

As an outcome of the industry-led working group, Enbridge Gas would like some additional clarify on Termination by Distributor of the third party. For example:

- What role does the OEB want the distributors to play as the distributor does not have the ability to govern and monitor how the third party utilizes the data.
- When third party access is revoked either by customer or by the distributor, the distributor is not responsible for data destruction.

Please contact the undersigned if you have any questions on these matters.

Sincerely,



Tracy Lynch
Director, Customer Care Operations
Enbridge Gas Inc.

cc: Eamon O'Riordan, OEB Case Manager (via email)