



December 1, 2021

VIA RESS

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

Dear Ms. Long,

**Re: Enbridge Gas Inc. (EGI)
2022 Federal Carbon Pricing Program Application
OEB File No. EB-2021-0209**

We are counsel to Anwaatin Inc. (**Anwaatin**) in the above-noted proceeding. Please find enclosed the interrogatories of Anwaatin, filed pursuant to Procedural Order No. 1.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Vollmer".

DT Vollmer

c. Richard Wathy, EGI
Tania Persad, EGI
Tyson Dyck, Torys LLP
Larry Sault, Anwaatin Inc.
Don Richardson

Encl.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sched. B, as amended (the **Act**);

AND IN THE MATTER OF an application by Enbridge Gas Inc., for an order or orders for gas distribution rate changes related to compliance obligations under the Greenhouse Gas Pollution Pricing Act, S.C. 2018, c. 12, s. 186. (the **Application**).

EB-2021-0209

INTERROGATORIES

OF

ANWAATIN INC.

December 1, 2021

Question: **Anwaatin-1**

Reference: • Exhibit A, Tab 1, Schedule 2, para 10

Preamble: EGI states that persons affected by the Application are the customers resident or located in the municipalities, police villages, **Indigenous communities and Métis organizations** served by EGI, together with those to whom EGI sells gas, or on whose behalf EGI distributes, transmits, or stores gas. [emphasis added]

- a) Please file any and all analysis EGI has performed in connection with how the Application will, or is anticipated to, affect Indigenous communities and Métis organizations, including First Nation and Métis peoples living in municipalities and police villages:
- (i) that EGI serves;
 - (ii) to which EGI sells gas (e.g., Six Nations Natural Gas); and
 - (iii) on whose behalf EGI distributes, transmits, or stores gas.

If EGI has not undertaken any such analysis, please explain why no such analysis has been undertaken, in light of paragraph 10.

Question: **Anwaatin-2**

Reference: • Exhibit A, Tab 2, Schedule 1, paras 46-47.

Preamble: The bill impact of the 2022 carbon charges for a typical residential customer with annual consumption of 2,400 m³ is an increase of \$47.05 per year in the EGD rate zone. The bill impact of the 2022 carbon charges for a typical residential customer with annual consumption of 2,200 m³ is an increase of \$43.14 per year in the Union rate zones.

The bill impact of the proposed 2020 FCPP-related deferral and variance account balance disposition for a typical residential customer with annual consumption of 2,400 m³ is \$0.76 in the EGD rate zone. The bill impact of the proposed 2020 FCPP-related deferral and variance account balance disposition for a typical residential customer with annual consumption of 2,200 m³ is \$0.27 in the Union South rate zone and \$0.34 in the Union North rate zone.

- a) Does EGI expect that the bill impacts outlined above will be experienced by Indigenous communities? If so, please explain how such bill impacts will be experienced in Indigenous communities. If not, please explain why not.
- b) Has EGI performed any analysis of the bill impact specific to Indigenous communities and peoples? If so, please provide the analysis. If not, please explain why no such analysis has been performed.
- c) Has EGI quantified the rate impact of the Application on Indigenous communities and peoples? If so, please provide the quantification of the rate impact and explain how it was quantified. If not, please explain why no such quantification was performed.
- d) What proportion of EGI's customers are members of Indigenous communities?
- e) Has EGI analysed how Indigenous customers living on- and off-reserves will be affected by the proposed carbon charge? If so, please provide the analysis. If not, please explain why no such analysis was performed.
- f) What proportion of EGI customers reside "on-reserve", as defined in the *Indian Act*?
- g) Can EGI identify prospective new EGI "on-reserve" communities and customers that will be served through future natural gas distribution expansions, and how the bill impacts will be experienced by those communities?
- h) Has EGI considered options to assist its Indigenous customers to reduce the bill impacts of FCPP charges through, for example, an air source heat pump offering program?

Question: Anwaatin-3

Reference:

- Exhibit B, Tab 1, Schedule 5
- Exhibit B, Tab 2, Schedule 5

Preamble: EGI forecasts the Total Customer-Related Costs in the EGD rate zone at \$1,039,496,078.

EGI forecasts the Total Customer-Related Costs in the Union rate zone at \$638,915,115.

- a) Please provide actual 2021 volumes delivered to Indigenous communities and the total customer-related costs of the Federal Carbon Charge for Indigenous communities in the EGD Rate Zone.
- b) Please provide actual 2021 volumes delivered to Indigenous communities and the total customer-related costs of the Federal Carbon Charge for Indigenous communities in the Union Rate Zone.

Question: **Anwaatin-4**

Reference: • Exhibit A, Tab 2, Schedule 1, paras 34-41 (including Table 3)

Preamble: EGI notes that in 2019, Enbridge Inc. implemented a Carbon and Energy Efficiency Plan (**CEE Plan**).

In Table 3, EGI provides estimated emissions reductions resulting from four opportunities identified to reduce facility-related emissions. EGI notes that as part of the Facility GHG Emissions Reduction project, it will continue to identify and review opportunities that reduce stationary combustion emissions (OBPS/EPS emissions) through various pathways, including electrification and RNG fuel switching (para 39).

Enbridge indicates that it will continue to identify, track and report on emission reduction opportunities using criteria that effectively balance management of its compliance obligations under the FCPP, estimated capital costs, safety and operational reliability (para 41).

- a) Please place the CEE Plan on the record in this proceeding.
- b) Please file all reports, presentations, analysis, data, or other materials (including drafts) related to the impact of the CEE Plan on Indigenous customers.
- c) Does EGI anticipate that emissions reductions achieved in and through the CEE Plan will be used to satisfy EGI's own OBPS/EPS compliance obligations?
- d) How are the costs of the CEE Plan recovered?
- e) Please file all reports, presentations, analysis, data, or other materials (including drafts) related the identification and review of (i) electrification and (ii) RNG fuel switching as possible opportunities that reduce OBPS/EPS emissions.
- f) Has EGI considered options for emissions-free thermal service expansion to unserved customers through the alternative of heat pumps? If so, please provide all related details and documentation.
- g) Has EGI identified any other opportunities that reduce OBPS/EPS emissions other than (i) electrification and (ii) RNG fuel switching? If yes, please indicate and provide details of each identified opportunity.
- h) What criteria does EGI use to effectively balance management of its compliance obligations under the FCPP, estimated capital costs, safety, and operational reliability? How are these criteria applied?

- i) As part of EGI's assessment of opportunities to reduce OBPS/EPS does EGI assess the bill impacts of its facility-related emissions on its Indigenous customers? If yes, please provide details. If not, please indicate and explain why not.

Question: **Anwaatin-5**

Reference: • Updated Exhibit C, paras 24, 30-31.

Preamble: EGI's forecasted 2022 administration costs are \$6.99 million: \$4.69 million for the EGD rate zone and \$2.30 million for the Union rate zones (IT billing system, staffing resources, consulting and external legal support, greenhouse gas (**GHG**) reporting and verification, bad debt, and other miscellaneous costs).

EGI plans to record actual 2022 costs in the Greenhouse Gas Emissions Administration Deferral Accounts (**GGEADAs**) until such time that these costs are incorporated into rates. EGI intends to seek recovery of its actual 2022 administration costs in a future proceeding.

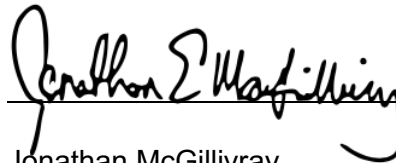
EGI states that it anticipates that it will incur a total of \$0.30 million in consulting and external legal costs in 2022 for work supporting the development and sustainment of EGI's carbon strategy and related analyses, the review and interpretation of any new or updated regulations associated with the GGPPA, EPS Regulation, or other GHG or carbon pricing programs and the development of Enbridge Gas's Application and associated OEB proceedings. EGI also notes that it may incur additional consulting and external legal costs associated with other GHG or carbon policies.

- a) Please outline what additional consulting and external legal services EGI anticipates that it will require in relation to each of the following:
- (i) development and sustainment of EGI's carbon strategy and related analyses;
 - (ii) review and interpretation of any new or updated regulations associated with the GGPPA;
 - (iii) review and interpretation of the EPS Regulation;
 - (iv) Indigenous engagement and consultation for the development and sustainment of EGI's carbon strategy and related analysis; and
 - (v) other GHG or carbon policies.

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS
1st day of December, 2021



Lisa (Elisabeth) DeMarco
Resilient LLP
Counsel for Anwaatin



Jonathan McGillivray
Resilient LLP
Counsel for Anwaatin