

Sent by Email

March 17, 2022

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Nancy Marconi, Acting Registrar

Dear Ms. Marconi:

Re: Board File No. EB-2022-0072 – Intent to Participate in Consultation re Annual Update to Enbridge’s Five-Year Natural Gas Supply Plan

Willms & Shier Environmental Lawyers LLP is counsel to the Ontario Sustainable Energy Association (“OSEA”).

OSEA seeks to participate in the consultation to review Enbridge Gas Inc.’s Annual Update to its five-year natural gas supply plan (“GSP”), including the Stakeholder Conference.

ABOUT OSEA

OSEA is a not for profit organization that is committed to representing the public interest on energy policy matters that contribute to energy conservation and sustainable energy development for Ontario. OSEA aims to ensure funding and rates that encourage conservation, energy efficiency and the incorporation of renewable energy.

OSEA’s members, both individuals and organizations, are interested in the development of sustainable energy and conservation in Ontario as consumers, individuals and citizens of Ontario. OSEA has been an intervenor and awarded costs by the Board in numerous previous hearings, and the Board recognized that OSEA can provide “an important and unique perspective” in EB 2011-0118.

OSEA actively participates and contributes in Board proceedings and consultations and intends to provide meaningful comments on Enbridge’s Annual Update to its GSP.

COST ELIGIBILITY

In accordance with section 3.03 of the Board's *Practice Direction on Cost Awards*, OSEA believes that it is eligible for an award of costs because it:

- a) primarily represents the direct interests of consumers in relation to services that are regulated by the Board, and
- b) primarily represents an interest or policy perspective relevant to the Board's mandate and to this consultation about Enbridge's GSP.

OSEA can continue to provide an important and unique perspective in the current consultation initiative. OSEA does not have the funds of its own to allocate towards its meaningful participation in this matter.

OSEA'S REPRESENTATION OF CONSUMERS

In accordance with criterion 3.03(a) from the *Practice Direction*, OSEA primarily represents the direct interests of consumers (eg. ratepayers) in relation to regulated services. OSEA's membership consists of several non-profit and community organizations that advocate for a variety of interest groups including ratepayers. OSEA's members include green technology developers, distributors, installers and operators and other service providers. OSEA thereby represents the direct interests of consumers.

OSEA serves as an advocate, network and capacity builder for individuals, manufacturers, installers, builders, developers, municipalities, First Nations, unions, farmers, co-operatives, NGO's, associations and other organizations supportive of, and engaged in, the full portfolio of sustainability energy solutions. OSEA also aims to provide education about all types of renewable energy technologies.

OSEA is a public interest organization that advocates for energy efficiency, renewable energy and innovation leading to a more sustainable energy economy. OSEA is not an association for energy generators. OSEA's membership is diverse, and includes small scale distributors and service providers of renewables, and very few large generators. OSEA's mandate includes assisting consumers and their communities to receive the best value for their energy dollars whether through conservation, efficiency, generation, or otherwise. OSEA is not a trade or industry association representing any specific product suppliers, generators, or specific generation technologies.

OSEA'S POLICY PERSPECTIVE RELATIVE TO THE BOARD'S MANDATE AND THIS CONSULTATION

The Board's mandate is articulated in the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), s. 2, and includes promoting energy conservation and energy efficiency in accordance with the policies of the Government of Ontario.

In accordance with criterion 3.03(b) from the *Practice Direction*, OSEA primarily represents a public interest relevant to the Board's mandate and to this proceeding. As previously stated, OSEA represents the public interest and advocates for methodologies and system planning to achieve energy conservation and energy efficiencies.

OSEA's mandate on energy conservation and sustainable energy relates to this GSP consultation. OSEA interests in this consultation include understanding:

- ♦ how the RNG portion of Enbridge's portfolio is performing compared to Enbridge's GSP Outlook
- ♦ how carbon emissions are addressed within the gas supply procurement process, and
- ♦ the accuracy of Enbridge's forecasted demand, which has implications for the implementation of DSM and IRPAs.

OSEA participated in the last consultation on Enbridge's Annual Update to the GSP (EB-2021-0004), and provided comments on Enbridge's demand forecast assumptions and blind RPF process.

OSEA has contributed fully to related proceedings and consultations that are impacted by gas supply planning. In particular, OSEA has contributed to the development of DSM policy in Ontario for many years. OSEA was invited to participate on the Advisory Committee for the DSM Guidelines. OSEA also intervened in Union Gas Limited and Enbridge Gas Distribution Inc.'s applications for the 2015-2020 DSM Framework (EB-2015-0029 and EB-2015-0049), the Board's mid-term review of the 2015-2020 DSM plans (EB-2017-0127 and EB-2017-0128), and Enbridge's application for the Post 2020 DSM Framework (EB-2019-0003). OSEA is currently participating in the proceeding about Enbridge's application for a Multi-Year Natural Gas DSM Plan (EB-2021-0002).

OSEA also intervened in Enbridge's application for its RNG Enabling Program and Geothermal Energy Service Program (EB-2017-0319), and Enbridge's Integrated Resources Planning proceeding (EB-2020-0091).

REPRESENTATIVES

OSEA's counsel and technical consultant in this matter are:

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Yours truly,



Joanna Vince
Partner
*Certified as a Specialist in Environmental Law
by the Law Society of Ontario*

cc: Dan Goldberger, OSEA

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